



# EDF proposed amendments to the European Electronic Communication Code

**February 2017**



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## EDF proposed amendments to the European Electronic Communication Code (Recast)

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The European Disability Forum is an independent NGO that represents the interests of 80 million Europeans with disabilities. EDF is a unique platform which brings together representative organisations of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

This document should be read along with the EDF proposed amendments to the European Accessibility Act.

### Introduction

EDF main objectives:

- Preserve equal access and choice
- Affordability
- Ensure availability of relay services: text and video
- Ensure real-time text and total conversation (voice, video and real-time text)
- Accessibility to 112 and 116000 through total conversation
- Must carry obligations for EPG – to be accessible

Doubts for the ICT expert group:

#### 1. Terminal equipment

The Commission (EC) is proposing to remove provisions for the equipment suitable for persons with disabilities (because of the Accessibility Act). It is worth remembering that the Act covers mainstream products.

- **Are you aware of any specific assistive device (not [relay] service) necessary for the provision of electronic communication?**
- **Do we agree with this approach?**

*AM – Personally, I believe we should support the removal of mainstream products for electronic communication services from the EEECC. However, we should also make sure that if we see a need for specialised products (e.g. TTYs for deaf people) which are not covered in the act, in this case we must specify in article 1.*

- **BDF is wondering about what would be the impact of removing provisions related to equipment suitable for persons with disabilities. The fact it would be covered by the EAA is a guess as long as it is still in negotiation. Wouldn't it be safer to maintain it as long as we refer to a non-existing document? We should also keep in mind that producers can always refer to unbearable burden.**



## 2. Definition of call

The EC defines call as follows:

(21) 'call' means a connection established by means of a publicly available electronic interpersonal communications service allowing two-way voice communication.

- **To recognise the importance of RTT, shall we remove the word "voice" from the text?**

- For BDF, the word "voice" can be removed in this context. What is important is communication. The voice is just one of the (main) means of it.

## 3. Interoperability for Real-time text

- **Is article 59 (Powers and responsibilities of the national regulatory authorities with regard to access and interconnection) the right place to ensure interoperability of RTT across the EU?**

## 4. Legacy universal services

The EC is proposing to remove what they called legacy universal services such as public payphones and directory enquiry services.

- **Do we agree with the removal of these?**

AM: *I would try to keep an accessible directory enquiry service, but as for the payphone I don't see the point in fighting for them if Member States habilitates points for internet access and voice communications.*

- Maintaining "Legacy universal services" can seem to be a rearguard action. Nevertheless, BDF would like to maintain a minimum of payphones in specific locations such as :
  - "entry points" on the territory of the EU : airports, some custom places
  - places where people arrive for emergency reasons such as hospital or police station
  - emergency parlor along highways

## 5. Must carry obligations

- **Are there any further provision we should include in the must-carry obligations?**



## Article 2. Definitions

Commission proposal	EDF amendments
	<p><b>(35new) Relay services means phone services operated by interpreters that enable people who are deaf or hard of hearing or who have a speech impairment, to communicate by phone through an interpreter with a person who can hear in a manner that is "functionally equivalent" to the ability of an individual without a disability</b></p> <p><b>(36new) Real time text means communication using the transmission of text where characters are transmitted by a terminal as they are typed in such a way that the communication is perceived by the user as being continuous</b></p>
Justification:	

## Article 3. General objectives

Commission proposal	EDF amendments
(c) contribute to the development of the internal market by removing remaining obstacles to, and facilitating convergent conditions for, investment in and the provision of electronic communications networks, associated facilities and services and electronic communications services throughout the Union, by developing	(c) contribute to the development of the internal market by removing remaining obstacles to, and facilitating convergent conditions for, investment in and the provision of electronic communications networks, associated facilities and services and electronic communications services throughout the Union, by developing

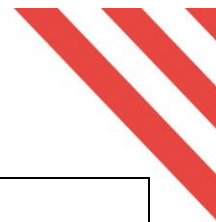




<p>common rules and predictable regulatory approaches, by favouring the effective, efficient and coordinated use of spectrum, open innovation, the establishment and development of trans-European networks, the availability and interoperability of pan-European services, and end-to-end connectivity;</p> <p>(d) promote the interests of the citizens of the Union, including in the long term, by ensuring widespread availability and take-up of very high capacity connectivity, both fixed and mobile, and of interpersonal communications services, by enabling maximum benefits in terms of choice, price and quality on the basis of effective competition, by maintaining security of networks and services, by ensuring a high and common level of protection for end-users through the necessary sector-specific rules and by addressing the needs, such as for affordable prices, of specific social groups, in particular disabled users, elderly users and users with special social needs.</p>	<p>common rules and predictable regulatory approaches, by favouring the effective, efficient and coordinated use of spectrum, open innovation, the establishment and development of trans-European networks, the availability and interoperability of pan-European services, and end-to-end connectivity <b>and equal access</b>;</p> <p>(d) promote the interests of the citizens of the Union, including in the long term, by ensuring widespread availability and take-up of very high capacity connectivity, both fixed and mobile, and of interpersonal communications services <b>including through real time text and relay services for end-users with disabilities</b>, by enabling maximum benefits in terms of choice, price and quality on the basis of effective competition, by maintaining security of networks and services, by ensuring a high and common level of protection for end-users through the necessary sector-specific rules and by addressing the needs, such as for affordable prices, of specific social groups, in particular disabled users, elderly users and users with special social needs.</p>
<p>Justification:</p> <p>“This what it was in the previous Directive and the Commission has adapted: (a) ensuring that users, including disabled users, elderly users, and users with special social needs derive maximum benefit in terms of choice, price, and quality;”</p>	

## Article 5. National regulatory and other competent authorities

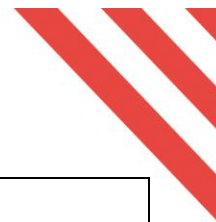
Commission proposal	EDF amendments
The national regulatory authority shall be responsible at least for the following tasks:	The national regulatory authority shall be responsible at least for the following tasks:



<p>...</p> <p>– ensuring consumer protection and end-user rights in the electronic communications sector;</p>	<p>...</p> <p>– ensuring consumer protection and end-user rights in the electronic communications sector, <b>including equal access and choice for end-users with disabilities</b>;</p>
Justification:	

## Article 68. Obligation of non-discrimination

Commission proposal	EDF amendments
<p>1. A national regulatory authority <b>may</b>, in accordance with the provisions of Article 66, impose obligations of non-discrimination, in relation to interconnection and/or access.</p> <p>2. Obligations of non-discrimination shall ensure, in particular, that the operator applies equivalent conditions in equivalent circumstances to other undertakings providing equivalent services, and provides services and information to others under the same conditions and of the same quality as it provides for its own services, or those of its subsidiaries or partners. In particular, in cases where the operator is deploying new systems, national regulatory authorities may impose on that operator obligations to supply access products and services to all undertakings, including to itself, on the same timescales, terms and conditions, including those relating to price and service levels, and by means of the same systems and processes, in order to ensure equivalence of access.</p>	<p>1. A national regulatory authority <b>shall</b>, in accordance with the provisions of Article 66, impose obligations of non-discrimination, in relation to interconnection and/or <b>equal</b> access.</p> <p>2. Obligations of non-discrimination shall ensure, in particular, that the operator applies equivalent conditions in equivalent circumstances to other undertakings providing equivalent services, and provides services and information to others under the same conditions and of the same quality as it provides for its own services, or those of its subsidiaries or partners. In particular, in cases where the operator is deploying new systems, national regulatory authorities may impose on that operator obligations to supply access products and services to all undertakings, including to itself, on the same timescales, terms and conditions, including those relating to price and service levels, and by means of the same systems and processes, in order to ensure equivalence of access, <b>including for end-users with</b></p>

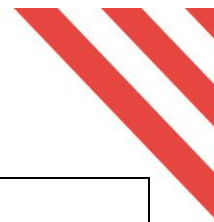


	<b>disabilities.</b>
Justification:	
EDF believes...	

## Article 79. Affordable universal service

Commission proposal	
<p>1. Member States shall ensure that all end-users in their territory have access at an affordable price, in the light of specific national conditions, to available functional internet access, and voice communications services at the quality specified in their territory, including the underlying connection, at least at a fixed location.</p> <p>2. Member States shall define the functional internet access service referred to in paragraph 1 with a view to adequately reflect services used by the majority of end-users in their territory. To that end, the functional internet access service shall be capable of supporting the minimum set of services set out in Annex V.</p> <p>3. When an end-user so requests, the connection referred to in paragraph 1 may be limited to support voice communications only.</p>	<p>1. Member States shall ensure that all end-users in their territory have access at an affordable price, in the light of specific national conditions, to available functional internet access, and voice communications services, <b>real time text and text and video relay services</b> at the quality specified in their territory, including the underlying connection, at least at a fixed location. <b>Average cost of the relay services for the end-user shall be equal to the average cost of voice communication services.</b></p> <p>2. Member States shall define the functional internet access service referred to in paragraph 1 with a view to adequately reflect services used by the majority of end-users in their territory. To that end, the functional internet access service shall be capable of supporting the minimum set of services set out in Annex V.</p> <p>3. When an end-user so requests, the connection referred to in paragraph 1 may be limited to support voice communications only.</p>
Justification:	

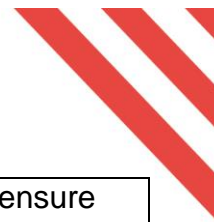




EDF believes...

## Article 80. Provision of affordable universal services

Commission proposal	EDF amendments
<p>1. National regulatory authorities shall monitor the evolution and level of retail tariffs of services identified in Article 79(1) available on the market, in particular in relation to national prices and national end-user income.</p> <p>2. Where Member States establish that, in the light of national conditions, retail prices for services identified in Article 79(1) are not affordable, because low-income or special social needs end-users are prevented from accessing such services, they may require undertakings which provide such services to offer to those end-users tariff options or packages different from those provided under normal commercial conditions. To that end, Member States may require such undertakings to apply common tariffs, including geographic averaging, throughout the territory. Member States shall ensure that end-users entitled to such tariff options or packages have a right to contract with an undertaking providing the services identified in Article 79(1) and that such undertaking provides them with an adequate period of availability of a number and avoid unwarranted disconnection of service.</p> <p>3. Member States shall ensure that undertakings which provide tariff options or packages to low-income or special social needs end-users pursuant to paragraph 2, keep the national regulatory authorities informed of the details of such offers.</p>	<p>1. National regulatory authorities shall monitor the evolution and level of retail tariffs of services identified in Article 79(1) available on the market, in particular in relation to national prices and national end-user income.</p> <p>2. Where Member States establish that, in the light of national conditions, retail prices for services identified in Article 79(1) are not affordable, because low-income or special social needs end-users are prevented from accessing such services, they <b>shall</b> require undertakings which provide such services to offer to those end-users tariff options or packages different from those provided under normal commercial conditions. To that end, Member States may require such undertakings to apply common tariffs, including geographic averaging, throughout the territory. Member States shall ensure that end-users entitled to such tariff options or packages have a right to contract with an undertaking providing the services identified in Article 79(1) and that such undertaking provides them with an adequate period of availability of a number and avoid unwarranted disconnection of service.</p> <p>3. Member States shall ensure that undertakings which provide tariff options or packages to low-income or special social needs end-users pursuant to paragraph 2, keep the national regulatory authorities informed of the details of such offers.</p>



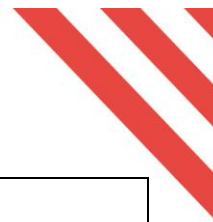
<p>National regulatory authorities shall ensure that the conditions under which undertakings provide tariff options or packages pursuant to paragraph 2 are fully transparent and are published and applied in accordance with the principle of non-discrimination. National regulatory authorities may require that specific schemes be modified or withdrawn.</p> <p>4. Member States may, in the light of national conditions, ensure that support is provided to low-income or special social needs end-users in view of ensuring affordability of functional internet access and voice communications services at least at a fixed location.</p> <p>5. Member States shall ensure, in the light of national conditions, that support is provided as appropriate to end-users with disabilities, or that other specific measures are taken, in view of ensuring that related terminal equipment, specific equipment and specific services enhancing equivalent access are affordable.</p> <p>6. When applying this Article, Member States shall seek to minimise market distortions.</p>	<p>National regulatory authorities shall ensure that the conditions under which undertakings provide tariff options or packages pursuant to paragraph 2 are fully transparent and are published and applied in accordance with the principle of non-discrimination. National regulatory authorities may require that specific schemes be modified or withdrawn.</p> <p>4. Member States <b><i>shall</i></b>, in the light of national conditions, ensure that support is provided to low-income or special social needs end-users in view of ensuring affordability of functional internet access and voice communications services, <b><i>including real time text and text and video relay services for end-users with disabilities</i></b> at least at a fixed location.</p> <p>5. Member States shall ensure, in the light of national conditions, that support is provided as appropriate to end-users with disabilities, or that other specific measures are taken, in view of ensuring that related terminal equipment, specific equipment and specific services enhancing equivalent access are affordable.</p> <p>6. When applying this Article, Member States shall seek to minimise market distortions.</p>
<p>Justification:</p> <p>EDF believes...</p>	

## Article 81. Availability of universal service

Commission proposal	EDF amendments
1. Where a Member State has duly demonstrated, account taken of the results of the geographical survey conducted in	1. Where a Member State has duly demonstrated, account taken of the results of the geographical survey conducted in



<p>accordance with Article 22(1), that the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service cannot be ensured under normal commercial circumstances or through other potential public policy tools, it may impose appropriate universal service obligations to meet all reasonable requests for accessing those services in its territory.</p> <p>2. Member States shall determine the most efficient and appropriate approach for ensuring the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service, whilst respecting the principles of objectivity, transparency, non-discrimination and proportionality. They shall seek to minimise market distortions, in particular the provision of services at prices or subject to other terms and conditions which depart from normal commercial conditions, whilst safeguarding the public interest.</p> <p>3. In particular, where Member States decide to impose obligations to ensure the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service, they may designate one or more undertakings to guarantee the availability at a fixed location of functional internet access service as identified in accordance with Article 79(2) and of voice communications service in order to cover all the national territory. Member States may designate different undertakings or sets of undertakings to provide functional internet access and voice communications services at a fixed location and/or to cover different parts of the national territory.</p> <p>4. When Member States designate undertakings in part or all of the national</p>	<p>accordance with Article 22(1), that the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service cannot be ensured under normal commercial circumstances or through other potential public policy tools, it <b>shall</b> impose appropriate universal service obligations to meet all reasonable requests for accessing those services in its territory.</p> <p>2. Member States shall determine the most efficient and appropriate approach for ensuring the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service, <b>real time text and text and video relay services</b> whilst respecting the principles of objectivity, transparency, non-discrimination and proportionality. They shall seek to minimise market distortions, in particular the provision of services at prices or subject to other terms and conditions which depart from normal commercial conditions, whilst safeguarding the public interest.</p> <p>3. In particular, where Member States decide to impose obligations to ensure the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service, <b>real time text and text and video relay services</b> they may designate one or more undertakings to guarantee the availability at a fixed location of functional internet access service as identified in accordance with Article 79(2) and of voice communications service in order to cover all the national territory. Member States may designate different undertakings or sets of undertakings to provide functional internet access and voice communications services at a fixed location and/or to cover different parts of the national territory.</p>
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<p>territory as undertakings having the obligation to ensure the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service, they shall do so using an efficient, objective, transparent and non-discriminatory designation mechanism, whereby no undertaking is a priori excluded from being designated. <b><i>Such designation methods shall ensure that functional internet access and voice communications services at a fixed location are provided in a cost-effective manner and may be used as a means of determining the net cost of the universal service obligation in accordance with Article 84.</i></b></p> <p>5. When an undertaking designated in accordance with paragraph 3 intends to dispose of a substantial part or all of its local access network assets to a separate legal entity under different ownership, it shall inform in advance the national regulatory authority in a timely manner, in order to allow that authority to assess the effect of the intended transaction on the provision at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service. The national regulatory authority may impose, amend or withdraw specific obligations in accordance with Article 13(2).</p>	<p>4. When Member States designate undertakings in part or all of the national territory as undertakings having the obligation to ensure the availability at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service, <b><i>real time text and text and video relay services</i></b>, they shall do so using an efficient, objective, transparent and non-discriminatory designation mechanism, whereby no undertaking is a priori excluded from being designated.</p> <p>5. When an undertaking designated in accordance with paragraph 3 intends to dispose of a substantial part or all of its local access network assets to a separate legal entity under different ownership, it shall inform in advance the national regulatory authority in a timely manner, in order to allow that authority to assess the effect of the intended transaction on the provision at a fixed location of functional internet access service as defined in accordance with Article 79(2) and of voice communications service. The national regulatory authority may impose, amend or withdraw specific obligations in accordance with Article 13(2).</p>
<p>Justification:</p> <p>EDF believes...</p>	



## Article 102. Emergency communications and the single European emergency call number

Commission proposal	EDF amendments
<p>1. Member States shall ensure that all end-users of the service referred to in paragraph 2, including users of public pay telephones, are able to access the emergency services through emergency communications free of charge and without having to use any means of payment, by using the single European emergency number '112' and any national emergency number specified by Member States.</p> <p>2. Member States, in consultation with national regulatory authorities and emergency services and providers of electronic communications services, shall ensure that undertakings providing end-users with number-based interpersonal communications service provide access to emergency services through emergency communications to the most appropriate PSAP. In case of an appreciable threat to effective access to emergency services the obligation for undertakings may be extended to all interpersonal communications services in accordance with the conditions and procedure set out in Article 59 (1) (c).</p> <p>3. Member States shall ensure that all emergency communications to the single European emergency call number '112' are appropriately answered and handled in the manner best suited to the national organisation of emergency systems. Such emergency communications shall be answered and handled at least as expeditiously and effectively as emergency communications to the national emergency number or numbers, where these continue to be in use.</p>	<p>1. Member States shall ensure that all end-users of the service referred to in paragraph 2, including users of public pay telephones, <b>real time text and relay services</b>, are able to access the emergency services through emergency communications free of charge and without having to use any means of payment <b>or pre-registration</b>, by using the single European emergency number '112' and any national emergency number specified by Member States.</p> <p>2. Member States, in consultation with national regulatory authorities and emergency services and providers of electronic communications services, shall ensure that undertakings providing end-users with number-based interpersonal communications service provide access to emergency services through emergency communications to the most appropriate PSAP. In case of an appreciable threat to effective access to emergency services the obligation for undertakings may be extended to all interpersonal communications services in accordance with the conditions and procedure set out in Article 59 (1) (c).</p> <p>3. Member States shall ensure that all emergency communications to the single European emergency call number '112' are appropriately answered and handled in the manner best suited to the national organisation of emergency systems. Such emergency communications shall be answered and handled at least as expeditiously and effectively as emergency communications to the national emergency</p>





4. Member States shall ensure that access for disabled end-users to emergency services is available through emergency communications and equivalent to that enjoyed by other end-users. **Measures taken to ensure that disabled end-users are able to access emergency services through emergency communications whilst travelling in other Member States shall be based to the greatest extent possible on** European standards or specifications published in accordance with the provisions of Article 39, and they shall not prevent Member States from adopting additional requirements in order to pursue the objectives set out in this Article.

5. Member States shall ensure that caller location information is available to the PSAP without delay after the emergency communication is set up. Member States shall ensure that the establishment and the transmission of the caller location information are free of charge for the end-user and to the authority handling the emergency communication with regard to all emergency communications to the single European emergency number '112'. Member States may extend that obligation to cover emergency communications to national emergency numbers. Competent regulatory authorities shall lay down criteria for the accuracy and reliability of the caller location information provided.

6. Member States shall ensure that citizens are adequately informed about the existence and use of the single European emergency call number '112', in particular through initiatives specifically targeting persons travelling between Member States.

7. In order to ensure effective access to emergency services through emergency communications to '112' services in the

number or numbers, where these continue to be in use.

4. Member States shall ensure that access for disabled end-users to emergency services is available through emergency communications and equivalent to that enjoyed by other end-users, **including through SMS, real time text, video call or third-party relay services. The Commission and the national regulatory and other competent authorities shall make sure that end-users with disabilities are able to access emergency services through the abovementioned accessible emergency communications whilst travelling in other Member State based on harmonised** European standards or specifications published in accordance with the provisions of Article 39, and they shall not prevent Member States from adopting additional requirements in order to pursue the objectives set out in this Article.

5. Member States shall ensure that caller location information, **and advanced mobile location (AML) system, are** available to the PSAP without delay after the emergency communication is set up. Member States shall ensure that the establishment and the transmission of the caller location information are free of charge for the end-user and to the authority handling the emergency communication with regard to all emergency communications to the single European emergency number '112'. Member States may extend that obligation to cover emergency communications to national emergency numbers. Competent regulatory authorities shall lay down criteria for the accuracy and reliability of the caller location information provided. **Member States shall make sure that citizens and visitors are adequately informed on their mobile phone about the means for disabled end-**

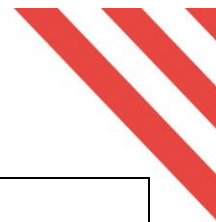




<p>Member States, the Commission shall be empowered to adopt delegated acts in accordance with Article 109 on the measures necessary to ensure the compatibility, interoperability, quality, reliability and continuity of emergency communications in the Union with regard to caller location solutions, access for disabled end-users and routing to the most appropriate PSAP.</p> <p>Those measures shall be adopted without prejudice to, and shall have no impact on, the organisation of emergency services, which remains in the exclusive competence of Member States.</p>	<p><b>users to reach the emergency services, especially when travelling to other countries.</b></p> <p>6. Member States shall ensure that citizens are adequately informed <b>on their mobile phones</b> about the existence and use of the single European emergency call number '112', <b>as well as its accessibility features</b>, in particular through initiatives specifically targeting persons travelling between Member States <b>including persons with disabilities.</b></p> <p>7. In order to ensure effective access to emergency services through emergency communications to '112' services in the Member States, the Commission shall be empowered to adopt delegated acts in accordance with Article 109 on the measures necessary to ensure the compatibility, interoperability, quality, reliability and continuity of emergency communications in the Union with regard to caller location solutions, access for disabled end-users <b>through SMS, real time text, video call and use of third-party relay service</b>, and routing to the most appropriate PSAP.</p> <p>Those measures shall be adopted without prejudice to, and shall have no impact on, the organisation of emergency services, which remains in the exclusive competence of Member States.</p>
<p>Justification:</p> <p>EDF believes...</p>	

## Article 103. Equivalence access and choice for disabled end-users

Commission proposal	EDF amendments
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<p>1. Member States shall ensure that the competent authorities specify, where appropriate, requirements to be met by undertakings providing publicly available electronic communications services to ensure that disabled end-users:</p> <p>(a) have access to electronic communications services equivalent to that enjoyed by the majority of end-users; and</p> <p>(b) benefit from the choice of undertakings and services available to the majority of end-users.</p> <p>2. In taking the measures referred to in paragraph 1, Member States shall encourage compliance with the relevant standards or specifications published in accordance with Article 39.</p>	<p>1. Member States shall ensure that the competent authorities specify, where appropriate, requirements to be met by undertakings providing publicly available electronic communications services to ensure that disabled end-users:</p> <p>(a) have access to electronic communications services equivalent to that enjoyed by the majority of end-users; and</p> <p>(b) benefit from the choice of undertakings and services available to the majority of end-users.</p> <p><b>c) the availability of at least one text based relay service and one video based relay service, within the entire territory of the Member State and continuously, in consultation with users' organisations, including organisations representing persons with disabilities, and that these relay services are interoperable with the telephony services.</b></p> <p>2. In taking the measures referred to in paragraph 1, Member States shall <b>ensure</b> compliance with the relevant <b>accessibility and interoperability</b> standards or specifications published in accordance with Article 39.</p>
<p>Justification:</p> <p>EDF believes...</p>	

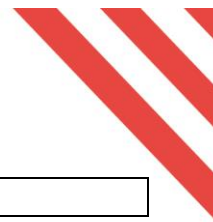
## Article 106. Must carry obligations

Commission proposal	EDF amendments



<p>1. Member States may impose reasonable 'must carry' obligations, for the transmission of specified radio and television broadcast channels and related complementary services, particularly accessibility services to enable appropriate access for disabled end-users and data supporting connected TV services and electronic programme guides , on undertakings under their jurisdiction providing electronic communications networks used for the distribution of radio or television broadcast channels to the public where a significant number of end-users of such networks use them as their principal means to receive radio and television broadcast channels. Such obligations shall only be imposed where they are necessary to meet general interest objectives as clearly defined by each Member State and shall be proportionate and transparent.</p> <p>The obligations referred to in the first subparagraph shall be reviewed by the Member States at the latest within one year of [date of entry into force of this Directive], except where Member States have carried out such a review within the previous four years. Member States shall review 'must carry' obligations at least every five years .</p>	<p>1. Member States <b>shall ensure</b> reasonable 'must carry' obligations, for the transmission of specified radio and television broadcast channels and related complementary services, particularly accessibility services to enable appropriate access for disabled end-users <b>to the</b> data supporting connected TV services and electronic programme guides , on undertakings under their jurisdiction providing electronic communications networks used for the distribution of radio or television broadcast channels to the public where a significant number of end-users of such networks use them as their principal means to receive radio and television broadcast channels. Such obligations shall only be imposed where they are necessary to meet general interest objectives as clearly defined by each Member State and shall be proportionate and transparent.</p> <p>The obligations referred to in the first subparagraph shall be reviewed by the Member States at the latest within one year of [date of entry into force of this Directive], except where Member States have carried out such a review within the previous four years. Member States shall review 'must carry' obligations at least every five years .</p>
<p>Justification:</p> <p>EDF believes...</p>	

Commission proposal	EDF amendments
<p>Justification:</p> <p>EDF believes...</p>	





## Related documents

- [EDF's initial position paper on the EAA \(2016\)](#)
- [EDF members' positions on the EAA](#)
- [Commission proposal for a Directive on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services \(European Accessibility Act\), COM \(2015\) 615](#)
- [EDF report: European Accessibility Act – State of play \(2014\)](#)
- [EDF Position on the European Accessibility Act \(2013\)](#)
- [EDF reply to the Commission consultation on the European Accessibility Act \(2012\)](#)
- [EDF reply to the Commission consultation on the Audiovisual Media Services Directive \(2015\)](#)
- [EDF and AGE recommendations for an inclusive Digital Single Market \(2015\)](#)
- [EDF top campaign on Web Accessibility](#)
- [EDF Toolkit for the promotion of the European Standard 301549 \(Mandate 376\), accessibility requirements for ICT products and services](#)

## Acknowledgments

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