



Brussels, Monday 5<sup>th</sup> December 2022

To: Ms. Ditte JUUL JØRGENSEN, Director-General, DG ENERGY  
Mr. Roberto VIOLA, Director-General, DG CONNECT

**RE: Planned electricity network outages and impact on telecommunications network in Europe**

Dear Director-General Juul Jørgensen,  
Dear Director-General Viola,

As Europe is now facing considerable challenges in relation to energy supplies, we welcome the strong and decisive leadership demonstrated by the European Commission to limit the impacts of the crisis. In this context, we note EU governments have taken or prepare mitigating measures which may include **planned outages of the electricity network**.

We are concerned that **telecommunications networks may not have been placed on priority sector lists** to be maintained during power outages. We understand that most European public safety answering points (PSAPs) are already designated as critical infrastructure in this context, meaning that reasonable measures will be taken to ensure that they are not affected by power outages. This is not the case for telecommunications networks which rely on connection to the electricity grid to operate.

Should telecommunications networks be subject to planned outages, citizens would risk not having access to communications services for the duration of the outage, including emergency communications. This includes fixed and mobile communication networks, whereas the latter should be in focus as the terminal devices (cell phones) run on batteries and therefore are not directly affected. Extending the current limited own back-up energy supply of telecommunication networks is not an option, as it would be not only extremely expensive but also as such an extension would take years – if it was feasible at all due to a number of practical and administrative obstacles. In our experience, batteries and diesel generators placed in mobile base stations are an easy target for vandalism and theft, and maintenance costs are high.

In any case, interrupted access to communication services including emergency services represents an **extremely concerning situation**. Furthermore, this would contravene the obligation on Member States regarding uninterrupted access to emergency communications in article 108 of Directive 2018/1972 (European Electronic Communications Code).

Therefore we call upon the European Commission to work together with Member States to ensure that in the event of planned electricity outages, **telecommunications networks be placed on priority lists to ensure continuity of service** and thus access to emergency communications.

Yours sincerely,

Lise FUHR  
Director-General, ETNO

Gary MACHADO  
Executive Director, EENA