

## Briefing

---

# Euralarm's contribution to the European Commission's White Paper on mastering Europe's digital infrastructure

---

Euralarm is pleased to offer its thoughts on the White Paper published by the European Commission on February 21, 2024, titled "How to master Europe's digital infrastructure." The White Paper discusses the need to adapt spectrum management to meet the demands of the Digital Decade, including the coordinated shutdown of 2G and 3G networks while ensuring the continued support of essential legacy services such as emergency and critical communications.

Euralarm would like to emphasize the potential risks and challenges associated with an uncoordinated and premature shutdown of 2G and 3G networks.

### 2G and 3G networks

As 2G and 3G networks are phased out in favor of 4G and 5G, many products and services that currently rely on these networks will be affected. Due to their age or limited bandwidth requirements, many products still use the 2G network. While 4G and 5G offer greater data transmission capacity, it is not necessary for simple warning or signaling systems. These systems in many cases are crucial for consumers' and companies' safety and security. 2G has proven to be the most effective technology for these needs due to its reach, which is why it is still widely used.

To prevent unintended consequences, a gradual and coordinated shutdown should be implemented, with at least one carrier in each Member State maintaining 2G or 3G until at least 2029-2030. Many EU Member States have not yet set an end date for the 2G network, allowing for a natural transition without risking people's lives and safety.

As an example, in France, the decommissioning of 2G and 3G networks will take place in two phases (between the end of 2025 and the end of 2026 for 2G; between the end of 2028 and the end of 2029 for 3G). According to a study carried out by PricewaterhouseCoopers, in France only, 7,8 million of devices (telecare alarms, security alarms, elevator alarms, medical equipment, eCall) currently operate in 2G or 3G (4 million in 2G and 3,8 million in 3G).<sup>1</sup> A significant number of devices won't have been migrated by the first deadline (between 2,2 million and 3,1 million depending on the scenario). Between 0,3 and 1,9 million of 3G devices could be affected from 2029. Other sectors not included in the study should also be impacted.

The EU should strongly encourage Member States to implement a delayed and harmonized shutdown of 2G and 3G networks.

---

<sup>1</sup> "Evaluation des impacts de l'arrêt de la 2G/3G en France – Focus sur les objets communicants critiques" – PwC for AFRATA, FAS, GPMSE and IGNES - June 2024

While it is within the authority of Member States to require telecom operators to delay the shutdown for security reasons, the European Commission has emphasized the importance of a deliberate and balanced approach, as outlined in the White Paper.

### Technological switch-off framework

Further on, we would like to stress the need for a technological switch-off framework in the field of mobile networks in general. The same issue faced with 2G and 3G switch-off could occur again with 4G, 5G and the next mobile networks. The European framework should address the challenges posed by mobile technology transition for all users, including IoT, particularly for safety and security uses. It should provide for the modalities of mobile network switch-off. Solutions to consider include obligations on operators such as: carrying out an impact assessment of the shutdown, consulting with all users and economic sectors concerned before fixing switch-off dates, setting a notice period taking into account users and economic sectors' constraints, ability of operators to propose alternative technologies, ensuring equivalent mobile coverage on next network, etc. The framework should give member countries the tools to ensure a smooth technological transition and suspend it if the conditions are not met.

## About Euralarm

Euralarm represents the fire safety and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our members make society safer and secure through systems and services for fire detection and extinguishing, intrusion detection, access control, video monitoring, alarm transmission and alarm receiving centres. Founded in 1970, Euralarm represents over 5000 companies within the fire safety and security industry valued at 67 billion Euros. Euralarm members are national associations and individual companies from across Europe.

Gubelstrasse 11 • CH-6300 Zug • Switzerland

E: [secretariat@euralarm.org](mailto:secretariat@euralarm.org)

W: [www.euralarm.org](http://www.euralarm.org)

## DISCLAIMER

This document is intended solely for guidance of Euralarm members, and, where applicable, their members, on the state of affairs concerning its subject. Whilst every effort has been made to ensure its accuracy, readers should not rely upon its completeness or correctness, nor rely on it as legal interpretation. Euralarm will not be liable for the provision of any incorrect or incomplete information.

*Note: The English version of this document is the approved Euralarm reference document.*