

# Position Paper

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## Euralarm Position Paper on Article 5.4 – Digital Networks Act Consultation

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### Introduction

This position paper addresses Article 5.4 of the proposed Digital Networks Act, specifically the requirement that providers of public electronic communications networks and publicly available electronic communications services inform national competent authorities and end-users “at least 2 years in advance, by providing a roadmap reflecting the migration process” when migration to other network technologies may result in discontinuation of services on currently used end-user devices.

As Euralarm, we represent stakeholders within the fire safety, electronic security, and social alarm sectors across Europe. These sectors provide life-safety critical services to millions of European citizens, including elderly persons, vulnerable individuals, businesses, and public institutions.

We strongly support the objective of ensuring transparency and predictability during network migrations as this is a critical aspect to secure the continuity of security and safety related services.

Currently there is a total lack of visibility on potential changes that the operators might operate in their network even though those changes can directly impact the provision itself of the communication service. In short, continuity of communication services is not secured and it is subject to unpredictable changes.

For example, the evolution of mobile communications networks from 2G to 4G, will lead to the discontinuation of services of those devices that are not ready to “understand” the new protocol.

The inclusion of the new provision in Article 5.4 is set to bring significant improvements to the current situation regarding network technology migrations. By requiring providers to inform end-users, including IoT companies specialising in security and safety services, well in advance of any changes, the proposed amendment enables these stakeholders to effectively adapt their operations to the modifications introduced in the networks. This enhanced transparency and predictability will help ensure that service continuity is maintained and that disruptions to critical safety and security operations are minimised.

However, Article 5.4 need still to be improved and aligned with the actual needs in case of the migration or changes to be implemented in a communication network.

As it will be explained in this document, Article 5.4, in its current form, presents considerable ambiguity. If the provision is interpreted as demanding that the entire migration process be completed within the two-year notification period, this would pose severe operational challenges. Specifically, such a requirement could be unmanageable for providers and may introduce risks for services where life-safety is at stake.

Furthermore, a longer notification period is essential to ensure the proper and secure migration of all connectivity-

based services. To safeguard service continuity throughout a migration, a pre-notification period of seven years should be granted. This extended timeframe is necessary to facilitate an orderly transition, preventing disruption and maintaining the reliability of critical services.

## Impact of connectivity discontinuation on Fire Safety, Security and Social Alarm Services

The fire safety, electronic security, and social alarm sectors rely extensively on public electronic communications networks to transmit alarm signals and emergency communications.

Examples include:

- Fire alarm transmission systems in residential and commercial buildings
- Intruder alarm systems
- Social alarm and telecare devices used by elderly and vulnerable persons
- Emergency communication systems in critical infrastructure

Across Europe, millions of installed devices depend on legacy network technologies (e.g., 3G and other legacy infrastructures). Ongoing 3G sunsets in several Member States and announced 2G phase-outs demonstrate that such migrations are already occurring. Migration to IP-based or next-generation networks typically requires:

- Replacement of communication modules or complete hardware units
- Product redesign and re-certification under EU and national conformity regimes
- Compliance testing for fire and safety standards
- On-site visits to each end-user location, requiring the collaboration and coordination with the end-user.
- Physical replacement and reconfiguration of equipment
- Coordination with building owners, service providers, and in some cases public authorities

This is not a simple software upgrade. In most of the cases, it involves full hardware replacement.

Life-safety communication equipment often has a lifecycle of 10–15 years and is subject to conformity assessment procedures that can take 12–24 months before market placement. These structural constraints must be considered when defining migration timelines.

## Scale and Practical Constraints

The scale of installations across Europe is significant:

- Millions of alarm transmission systems are currently deployed.
- Many are installed in private homes of elderly persons who depend on uninterrupted service for their safety.
- A significant proportion are in regulated environments where equipment must meet strict certification and periodic inspection requirements.

Replacing millions of installations within a two-year timeframe would be operationally impossible at European scale due to:

- Limited availability of certified replacement products at the time of announcement
- Manufacturing and supply chain constraints
- Limited qualified installation workforce
- Administrative and inspection bottlenecks
- Financial burden on consumers and public authorities

Furthermore, abrupt or poorly managed migration could create a temporary but widespread safety gap affecting millions of citizens simultaneously. This would undermine the public interest and contradict the objective of resilience in critical infrastructure.

## Consumer and societal impact

The primary concern arising from changes to communication networks, particularly when such changes are not communicated well in advance, is the risk of discontinuity in safety and security services. Without sufficient notice, it becomes impossible to guarantee uninterrupted provision of these essential services, which are critical for the wellbeing and protection of vulnerable individuals.

Moreover, transitioning to new network technologies often necessitates the replacement of existing hardware. This migration process imposes direct costs on end-users, including:

- Replacement of equipment
- Installation and service call charge
- Upgrades to dependent infrastructure

These combined impacts—both operational and financial—reinforce the necessity of careful planning and timely communication when implementing network changes that affect life-safety services.

## Lack of Clarity in Article 5.4

Article 5.4 states that providers shall inform authorities and end-users “at least 2 years in advance, by providing a roadmap reflecting the migration process.”

The wording is unclear on a critical point:

- Does the “2 years in advance” requirement refer only to the provision of the roadmap?
- Or does it imply that the discontinuation of legacy services may take place two years after notification?

The current text does not explicitly distinguish between:

1. The timing of roadmap publication; and
2. The minimum duration of the migration/transition period before service discontinuation.

This ambiguity creates regulatory uncertainty for industries that depend on legacy network technologies for essential life-safety functions.

We respectfully request clarification that:

- The “2 years in advance” obligation refers to the minimum notice period for publication of the roadmap; and
- It does not imply that the full migration and switch-off must be completed within two years.

Our proposal is that the prior notification period is referred to the publication of the roadmap itself, but in any case, more time shall be granted to carry out the migration as it is explained below.

## Required Transition Period

Based on practical industry experience from previous network transitions across Member States, a realistic and safe transition period for life-safety applications is **7 years from formal notification of discontinuation**.

This duration is necessary to:

- Develop and certify compliant replacement products
- Ensure manufacturing capacity
- Train installation and service personnel
- Organize structured replacement programs
- Protect continuity of life-safety services
- Avoid overwhelming consumers and installers
- Maintain public trust

A **7 year** transition window is proportionate and justified for critical safety systems, while still supporting digital network modernization objectives.

## Euralarm recommendations: proposed Clarification and Amendment

Euralarm recommends that Article 5.4 be clarified or amended to:

1. Explicitly state that the two-year period refers to the minimum advance notice for publication of the migration roadmap;
2. Require that migration roadmaps for services supporting life-safety, security, and social alarm applications include extended transition timelines reflecting operational realities;
3. Recognize that where hardware replacement at end-user premises is required for life-safety systems,, a minimum transition period of **7 years**) is necessary to ensure continuity of critical services.

All these objectives can be covered modifying the article as follows, which implies giving the information **7 years** in advance to all potential impacted stakeholders:

*"Article 5:*

*Providers of public electronic communication networks and PSAPs shall take all necessary measures (...) to ensure uninterrupted availability of critical communications and emergency communications, as well as uninterrupted transmission of public warnings, in the case of natural or man-made disruptions, crises, or force majeure that may negatively affect the population.*

*When implementing new technologies in their electronic communications networks or services, providers of public electronic communications networks and publicly available electronic communications services and PSAPs shall take all necessary preparatory measures, including testing and validation of solutions, to ensure the availability of emergency communication and public warning services within the Union.*

*Where the migration to other network technologies may result in the discontinuation of services on currently used end-user devices, providers of public electronic communications networks and publicly available electronic communications services shall inform national competent authorities and end-users at least **7 years** in advance, providing a roadmap reflecting the migration process."*

## Conclusion

We support the objectives of the Digital Networks Act and the modernization of European communication networks. However, legal certainty and operational feasibility are essential.

Without clarification, Article 5.4 risks:

- Regulatory uncertainty
- Unfeasible migration timelines
- Disruption of fire safety, security, and social alarm services
- Increased costs for consumers
- Potential risks to life and safety
- Temporary safety gaps affecting millions of citizens

To safeguard European citizens—particularly vulnerable users dependent on life-safety systems—a structured and realistic transition period of **7 years** is essential when migration requires hardware replacement at end-user premises.

We respectfully ask the commission to clarify Article 5.4 accordingly and to ensure that life-safety services are explicitly considered in the final text of the Digital Networks Act.

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## 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.

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

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