

In-Vehicle Emergency Call Systems (E-CALL) In Turkey

In-vehicle emergency call (eCall) systems, which have been in use for a long time, are defined as systems within vehicles being activated either automatically or manually, that establish connection with the 112 emergency call centers in cases of an emergency.

Legislations regulating in-vehicle emergency call systems have been on the agenda of the European Union since 2007. The Regulation 2015/718 Concerning Type-Approval Requirements for the Deployment of the eCall In-Vehicle System Based on the 112 Service imposes the production of vehicles possessing the in-vehicle 112 emergency call systems within the EU in compliance with this system as of March 31, 2018.

The in-vehicle emergency call system detects the location information of the contacting vehicle via the GPS and activates in case of the accident by estimating the damage of the vehicle through the sensors in it; and contact with the Emergency Call Center is established. This system may also be activated manually according to the circumstances.

Within the scope of Project 1 for Harmonized In-Vehicle Emergency Call Systems between 2011 and 2013, 9 EU countries started the implementation of the emergency call system; and 6 new countries were included into the project with Project 2 for Harmonized In-Vehicle Emergency Call Systems by the EU between the years 2013 and 2015 and Turkey was also among the pilot countries of the project. The primary objective of the EU Project for Harmonized In-Vehicle Emergency Call Systems is to set up the in-vehicle emergency call systems within the EU countries and ensure the coordination of the countries' e-Call services.

In Turkey, the Regulation on Type Approval in Relation to the Deployment of the 112 Emergency Call Service Based In-Vehicle Emergency Call, which was prepared as part of the harmonization process with EU legislation and with consideration to Regulation 2015/758 dated 29/04/2015, was published by the Ministry of Science,

Industry and Technology on August 19, 2018 and said regulation entered into force on March 31, 2018. The regulation formulates the subjects of the manufacturers' obligations as regards the 112 Based In-Vehicle Emergency Call Systems and relevant authorization.

The Information and Communication Technologies Authority has also referred to regulations regarding 112 Based In-Vehicle Emergency Call Systems in its decision dated January 22, 2018. With particular consideration to the risks that could be experienced due to the fact that these systems are implemented through the connection processed via foreign operators, specific attention has been paid to the fact that the information system and services needed must be provided from domestic and national resources. In this regard, it was resolved that:

- In the event there is no SIM card, eSIM (embedded SIM) card or a module etc. that serves as a SIM card in the 112-based in-vehicle emergency call (eCall) system or in the event connection to the network of the relevant operator of subscription fails at the time of the eCall, necessary and appropriate measures must be taken by the operators in order for such eCall to be transferred to the relevant Emergency Call Center by the operator who receives such call;
- In the event such modules are used solely for eCall purposes, they must be procured from the mobile operators that operate in Turkey or must be programmable to enable that they are controllable by such operators; however, subscription contracts are not required to be executed for the communication modules that fall to the foregoing scope, in spite of which the operators take all necessary measures in order to ensure that such modules can call 112 only and be called back by 112;
- In the event of the use of a SIM card, eSIM card or a module etc. that serves as a SIM card on the communication systems that are on board of vehicles, which are manufactured in Turkey or are imported in accordance with the Regulation on Type Approval in Relation to the Deployment of the 112 Emergency Call Service Based In-Vehicle Emergency Call System, and which enable the rendering of value-added services in addition to eCall; such SIM card, eSIM card

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or module etc. that serves as a SIM card must be procured from the mobile operators that have been authorized to perform mobile electronic communications in Turkey or be programmable to enable that they are controllable by such operators, and the relevant subscription transactions must be conducted in compliance with the applicable legislation;

- The servers, which are to serve to the communication systems that are on board of vehicles, which are manufactured in Turkey or are imported in accordance with the Regulation on Type Approval in Relation to the Deployment of the 112 Emergency Call Service Based In-Vehicle Emergency Call System, and which enable the rendering of value-added services in addition to eCall, must be kept and located in Turkey, and the personal data on the system must not be transferred abroad without the express consent of the data subject.

In light of the above, if there are eCall systems within the vehicles manufactured or imported to be used in Turkey, the manufacturers must be mindful of the fact that they will be subject to various regulations; such as the authorization regulations of the Information and Communication Technologies Authority, legislation on the Protection of Personal Data, regulations with respect to locating servers in Turkey and the procurement of SIM Cards that are used within communication systems from mobile operators that have been authorized in Turkey, as well as the fact that their production processes should be developed accordingly.



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