

On using Bluetooth-Low-Energy for contact tracing

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1 Introduction

The goal of contact tracing is to keep track of contact between individuals in order to inform persons who have been exposed to a risk of infection. Performing contact tracing with the aid of digital tools such as smartphones has been considered by a number of countries. Many of those contact-tracing proposals are based on Bluetooth Low Energy (BLE), a medium range wireless technology available on most smartphones. The core idea is to use BLE to exchange information between nearby smartphones in order to keep track of the contact of their owners.

Even if it has not been designed to measure distance, its limited range along with signal strength indicator could provide a good enough estimation of proximity [13]. Furthermore, BLE has been designed to have a low energy footprint, which is important for a task that must be kept running all the time on a device with limited battery resources.

Behind the consideration of distance estimation and energy consumption remains several issues regarding the technical choices for the device-to-device communications. This document will cover those details and will discuss how contact tracing can be implemented based on BLE.

This document solely focuses on BLE communication aspect of a contact tracing application, in particular, it does not discuss in detail the distance estimation nor the energy consumption aspects. The goal of this document is to introduce the technical elements behind BLE-based contact tracing, present the technical limitations and describe the envisioned solutions.

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1.1 Requirements for a contact tracing application

To be efficient, a BLE-based contact tracing application has to satisfy a number of properties for the functionality and privacy aspects. We propose the following list that covers the main requirements that must be fulfilled by a contact tracing application:

[DATA_TRANSMIT] : a device running the app can transmit pieces of data to nearby devices running the app.

[DATA_RECEIVE] : a device running the app can receive pieces of data from nearby devices running the app.

[ALWAYS_ACTIVE] : the transmission and reception of data must always be active while the app is running.

[NO_TRACKING] : the pieces of data transmitted by the app must not be useful for physical tracking. In other words, an attacker should not be able to leverage contact tracing data to physically track a user.

[ADDR_RAND] : data transmission should not interfere with address randomization scheme used in BLE.

The requirements `DATA_TRANSMIT`, `DATA_RECEIVE` and `ALWAYS_ACTIVE` cover functionality aspects while `NO_TRACKING` and `ADDR_RAND` cover privacy aspects.

2 Bluetooth Low Energy

Bluetooth Low Energy is a lightweight subset of Bluetooth that has been introduced in 2010 as part of the Bluetooth specification version 4.0 [5, Vol 6]. As the legacy Bluetooth, it operates in the 2.4GHz ISM band, in which are defined 3 advertisement channels and 37 data channels.

In BLE, devices can endorse one of two role, *peripheral* or *central*, and are identified by a *device address*. Once connected, a peripheral and a central can communicate by exchanging packets that over the BLE data channels.

2.1 Advertising

As a preliminary step to establish a connection, BLE features an advertising scheme in which peripherals announce themselves by periodically broadcasting *advertising packets* over the three advertisement channels. Central devices detect nearby devices by tuning on the advertisement channel and listening to *advertising packets*.

An *advertising packets* includes an *Advertising Address* followed by some *advertising data* (see example in Figure 1). The Advertising Address is 48 bits long and corresponds to the device address of the emitting peripheral. The advertising data can contain up to 31 bytes organised in Advertising Data Elements, type-length-value structures that carry information such as the device name, service UUIDs, service data or manufacturer specific data¹.

2.2 Custom applications of BLE advertising

The primary purpose of BLE advertising is the discovery of nearby devices with their characteristics, prior to a connection. However, the freedom left by technical specification offers room to other purposes for instance the transmission of data without a connection [11]. BLE *Beacons* are

¹<https://www.bluetooth.com/specifications/assigned-numbers/generic-access-profile>

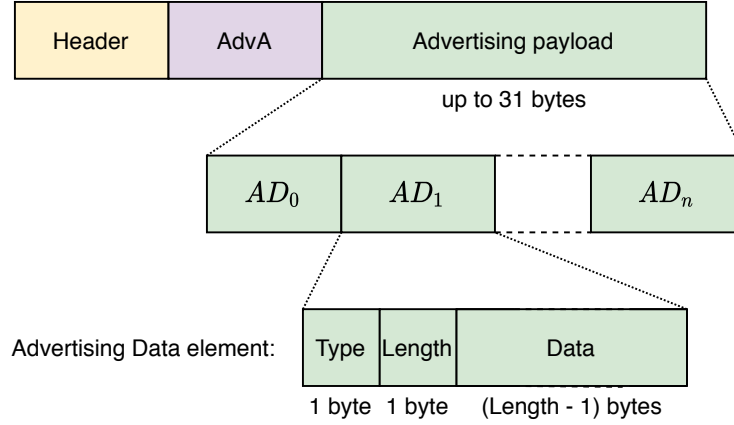


Figure 1: A BLE advertising packet includes the device address of the emitter (AdvA), along with an advertising payload organised in Advertising Data Elements.

an example of such application which are static emitters broadcasting a unique identifier used for geolocation purposes. BLE beacons are based on BLE advertising and use the advertising packets to carry their identifier in a dedicated field². Furthermore, major Vendors, such as Apple, Google and Microsoft, have developed close range device-to-device communication framework based on BLE advertising [9, 10]. The advertising packets are used to carry datagrams for a wide range of applications: device pairing, task and file transfer, device tracking, etc. [4, 10].

2.3 Device address randomization

As a feature to protect users against tracking, BLE supports address randomization. More specifically, the Bluetooth specification defines *private addresses* which are randomly generated addresses that are to be rotated periodically. This feature is used in many devices, including smartphones running the most recent versions of Android and iOS.

2.4 ATT: the attribute protocol

The attribute protocol (ATT) is a protocol included in BLE for discovering, reading, and writing attributes on a remote device. Attributes are composed of a handle, a type and a value, and are generally exposed and organized in a GATT profile (Generic Attribute Profile).

The ATT protocol requires a connection between two devices, but this connection does not necessarily require pairing and can be done without authentication. As a result, two devices can use the ATT protocol to exchange information opportunistically and without user intervention.

3 Models for contact tracing with BLE

Recent developments of BLE-based contact tracing have seen the adoption of two models: a connected model in which two devices establish a connection to exchange data, a broadcast model in which devices broadcast and collect undirected messages. This section presents the two approaches, after having introduced common features.

3.1 General features shared by all models

In order to identify a contact person, current proposals rely on the transmission of contact tracing data, which include an identifier as well as metadata. Identifiers are rotated periodically

²<https://developer.apple.com/ibeacon/>

and are unlinkable in order to protect against tracking (cf. NO_TRACKING requirement), and other kinds of attacks (e.g., social graph reconstruction).

The metadata accompanying the identifier can include a protocol version identifier, a country code for roaming, and information about the transmitter characteristics to improve the accuracy of proximity estimation.

3.2 Broadcast model

The broadcast model leverages the advertising mechanism of BLE to carry contact tracing data in advertising packets. Each device periodically broadcasts advertising packets containing the contact tracing data carried within an advertising data element. Simultaneously, each device collects incoming advertising packets, and extracts and records the contact tracing data (see Figure 2).

Advertising packets have a payload of 31 bytes but 3 bytes must be reserved for the Flags AD structure, leaving 28 bytes for the contact tracing data. Furthermore, each AD structure starts with a 2 bytes long type-length header, further reducing the available space. If only one AD structure is used (in addition to the Flags AD structure) there is a total of 26 bytes that can be used to carry contact tracing data.

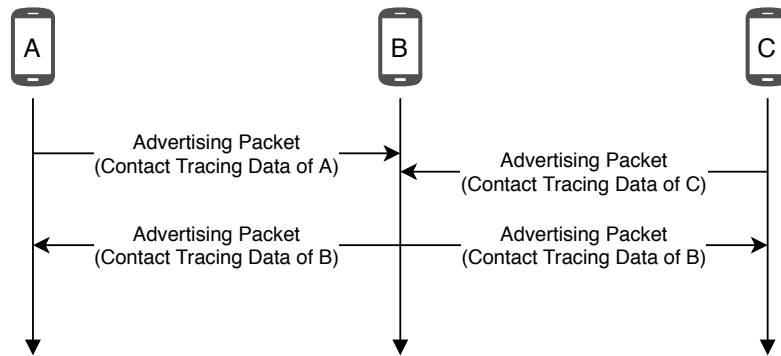


Figure 2: Broadcast model for BLE-based contact tracing. Each device broadcasts advertising packets carrying its contact tracing data. An advertising packet can be received by several devices in range (e.g., the advertising packet of B is received by A and B).

Several types of AD element can be used to carry the contact tracing data. A first option is to use the service data associated to a dedicated service. This first option requires to advertise the service itself in addition to the service data, leaving only 20 bytes for the contact tracing data.

A second option is to use the manufacturer specific AD structure which is designed to carry custom data. In this case, a single AD element is used, limiting the AD header overhead to 2 bytes. A manufacturer specific AD must start with a company ID on 2 bytes, leaving 25 bytes for contact tracing data.

As of today, most systems have adopted the first option: 20 bytes of contact tracing data carried by a service data AD element.

3.3 Connected model

The connected model relies on the connection between two devices to exchange the exchange of contact tracing data (see Figure 3). Each device advertise its support of the contact tracing system by including the corresponding service UUID in the advertising packets. Upon detection of a nearby device supporting the service, a device will establish a connection and will exchange contact tracing data with the remote device.

Most solutions exchange data using the ATT profile: each device expose a service and the contact tracing data is transferred by writing and reading attributes of this service on the remote device. The amount of data that can be exchanged by two devices in the **Connected Model** is only limited by the duration of the connection.

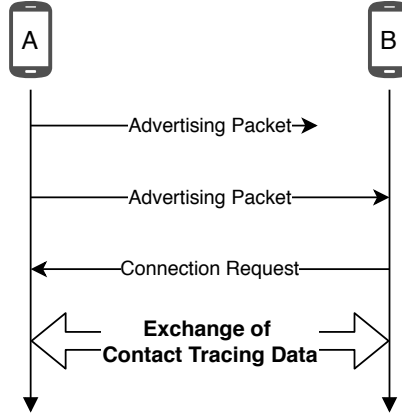


Figure 3: Connected model for BLE-based contact tracing. Device A announces itself by broadcasting advertising packets including the UUID of the contact tracing service. After receiving one of those packets, device B initiates a connection with B, then A and B exchange their contact tracing data through this connection.

3.4 Hybrid model

The broadcast and connected models are not mutually exclusive and can be used simultaneously. An hybrid model combining the two approaches can be envisioned (see Figure 4). Such hybrid model has been considered [17, 12] to overcome some constraints imposed by iOS³.

In the hybrid model, devices that do not support the broadcast model will use the connected model to exchange contact tracing data; other devices will use the broadcast model.

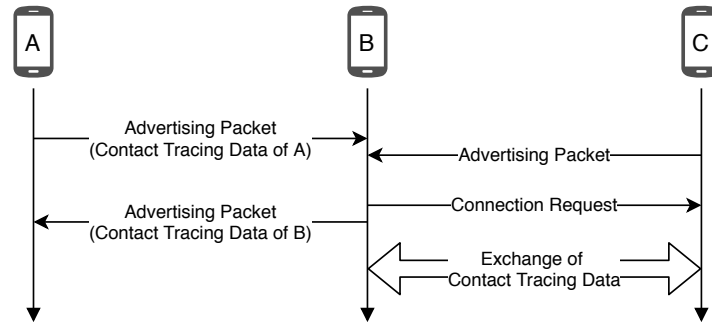


Figure 4: Hybrid model for BLE-based contact tracing. Device A and B exchange their contact tracing data following the broadcast model. Due to limitations of the OS, device C is unable to use the broadcast model. Therefore, device B and C will use the connected model to exchange their contact tracing data.

³“the protocol uses both broadcast-oriented and connection-oriented BLE modes”<https://github.com/TCNCoalition/TCN>

3.5 Comparison of the communication models

The broadcast and connected models each have advantages and limitations. First with regard to the amount of data, the broadcast model is limited to the capacity of an advertising packet which offers at most 25 bytes of useful data; while in the connected model the amount of data that can be exchanged is only limited by the bandwidth and duration of the connection.

A second aspect that differs between the two models is the scalability. In the broadcast model, a single advertising packet is potentially enough to transmit contact tracing data to all nearby devices; whereas with the connected model, it is necessary to establish a connection for each nearby device. Therefore, the broadcast model is more scalable than the connected model.

3.6 Advertising parameters

A key requirement of both models is that nearby devices receive advertising packets of each other. In the broadcast model, those packets carry the contact tracing information, while in the connected model, they enable the detection and identification of a device preliminary to the creation of the connection used to exchange contact tracing data.

The reception of advertising packet depends on several parameters on both the advertiser (emitter of the advertising packet) and the scanner (receiver of the advertising packet). More particularly, for a successful reception, the scanner must be in receiving mode when the advertiser transmits the advertising packet.

The advertiser periodically transmits advertising packets with a period called the **advertising interval**. The scanner, packet is not continuously scanning and its scanning behavior is characterized by two main parameters: the **scanInterval**, which determine the time between two consecutive scans, and the **scanWindow**, which determine the duration of a scan (see Figure 5).

Those parameters have a direct impact on the discovery speed and on the energy consumption. Depending on the application various advertising and scan parameters can be configured. For instance Android supports a low power scan mode and a low latency scan mode, in which the default⁴ values of **scanInterval** and **scanWindow** of 512 ms and 5120 ms, respectively 4096 ms and 4096 ms⁵.

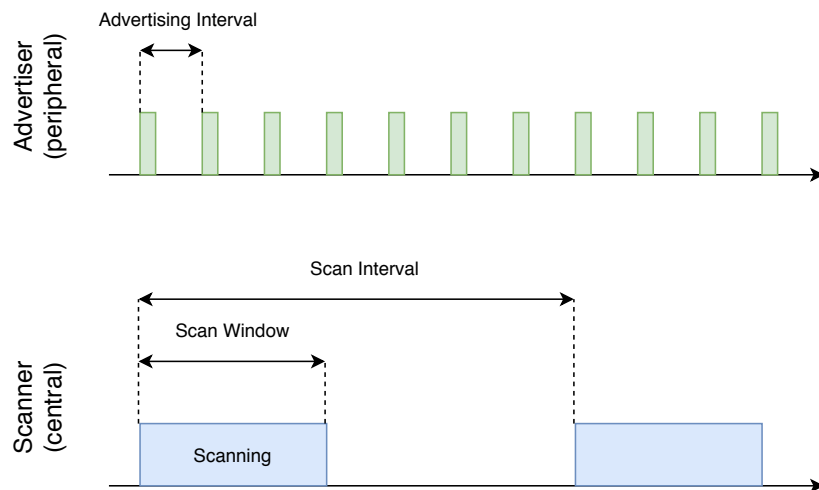


Figure 5: Simplified representation of advertising and scan behaviours in BLE.

⁴Those values can vary from one device to the other because of OS customization by vendors.

⁵<https://android.googlesource.com/platform/packages/apps/Bluetooth/+/master/src/com/android/bluetooth/gatt/ScanManager.java>

3.7 BLE advertising payload

In the **Broadcast Model**, contact tracing data is carried in the payload of advertising packets. As discussed in section 3.2 there are several options on how to format this data. In this section we present the details of the advertising payload of two prominent solutions: the GAEN and StopCovid, the french contact tracing application.

3.7.1 Payload of the Google & Apple Exposure Notification framework

The GAEN (Google & Apple Exposure Notification) framework, is a technical solution for contact tracing introduced by Apple and Google [1]. In GAEN, the contact tracing data is carried by a **Service Data** field associated with a service dedicated to contact tracing: the *Exposure Notification* Service identified by the UUID 0xFD6F. The contact tracing data is composed of a 16 bytes identifier, called **Rolling Proximity Identifier**, accompanied by 4 bytes of encrypted metadata, called **Associated Encrypted Metadata (AEM)**⁶. The AEM is composed of a service version on 1 byte, transmit power level indicator on 1 byte, and 2 additional bytes reserved for future use. The GAEN specifications [1] defines the payloads of advertising packets (see Figure 6). It includes:

- **Flags** (3 bytes): Not specific to exposure notification, but must be included in every advertising packet.
- **Complete 16-bit Service UUID** (4 bytes): carry the UUID of the exposure notification service (0xFD6F).
- **Service Data - 16-bit UUID** (24 bytes): carry the data associated to the exposure notification service along with the the UUID of the exposure notification service.
 - the exposure notification service UUID (0xFD6F)
 - **Rolling Proximity Identifier** (16 bytes): the temporary identifier derived by the EN framework.
 - **Associated Encrypted Metadata** (4 bytes): encrypted metadata (version, transmit power level) associated to the device.

3 bytes			4 bytes			24 bytes				
Flags			Complete 16-bit Service UUID			Service Data - 16-bit UUID				
Length	Type	Flags	Length	Type	Service UUID	Length	Type	Service Data		
0x02	0x01 (Flag)	0x1A	0x03	0x03 (comp 16-bit service UUID)	0xFD6F (Exposure Notification service)	0x17	0x16 (Service Data - 16-bit UUID)	0xFD6F (Exposure Notification service)	16 bytes Rolling Proximity Identifier	4 bytes Associated Encrypted Metadata

Figure 6: Payload of the advertising packet as specified for the GAEN framework. The **Rolling Proximity Identifier** and the **Associated Encrypted Metadata** are carried by a **Service Data** structure associated to the Exposure Notification service (UUID 0xFD6F)

⁶The AEM is encrypted using a key derived from the Temporary Exposure Key (TEK - the key used to derive the **Rolling Proximity Identifier**) and also depends on the current **Rolling Proximity Identifier** [2].

3.7.2 Payload of the StopCovid application

The StopCovid⁷ application deployed by the French government and based on the ROBERT protocol [8] uses the Hybrid Model. As the GAEN, StopCovid relies on a **Service Data** field associated to a dedicated service (UUID 0xFD64) to carry the contact tracing data. This contact tracing data is composed of, a 1 byte encrypted country code (ECC), an EBID (the 8 bytes temporary identifier of the ROBERT protocol), a timestamp (epoch encoding on 2 bytes), a message authentication code (HMAC of EBID and timestamp) and metadata including version, transmission power level (for RSSI correction [14]) and two reserved bytes.

Overall the advertising payload is presented in Figure 7 and is organized as follows:

- **Flags** (3 bytes): Not specific to exposure notification, but must be included in every advertising packet.
- **Complete 16-bit Service UUID** (4 bytes): carry the UUID of the dedicated risk notification service (0xFD64).
- **Service Data - 16-bit UUID** (24 bytes): carry the data associated to the risk notification service along with the risk notification UUID
 - UUID of the dedicated risk notification service (0xFD64).
 - **ECC** (1 byte): encrypted country code.
 - **EBID** (8 bytes): the temporary identifier used by the ROBERT protocol.
 - **Time** (2 bytes): encodes the current epoch.
 - **MAC** (5 bytes): message authentication code computed from **EBID** and **Time** using HMAC-SHA256.
 - **Metadata** (4 bytes): version on 1 byte, **txPowerLevel** on 1 byte, and 2 additional bytes reserved for future use.

3 bytes			4 bytes			24 bytes										
Flags			Complete 16-bit Service UUID			Service Data - 16-bit UUID										
Length	Type	Flags	Length	Type	Service UUID	Length	Type	Service Data								
0x02	0x01 (Flag)	0x1A	0x03	0x03 (comp 16-bit service UUID)	0xFD64 (Risk Notification service)	0x17	0x16 (Service Data - 16-bit UUID)	0xFD64 (Risk Notification service)	1 byte ECC (Encrypted Country Code)	8 bytes EBID	2 bytes Time	5 bytes MAC (Message Authentication Code)	1 byte Version	1 byte Tx Power Level	2 bytes Reserved	

Figure 7: Payload of the advertising packet used by the StopCovid application. The EBID, timestamp, MAC and the metadata are carried by a **Service Data** structure associated to a risk notification service (UUID 0xFD64)

4 OS functionalities and limitations

BLE is a feature included in all modern smartphones, nevertheless the usage of this wireless interface may be constrained by the operating system. In particular, all the functionalities are not directly available to an application, and when they exist, their usage may be subject to further limitation depending on the status of the application.

⁷<https://gitlab.inria.fr/stopcovid19/accueil>

4.1 Available BLE fonctionnalités

Operating systems offer access to BLE functionalities via an API. On Android an app has access to many BLE advertising functionalities: an app can start BLE advertising⁸ and configure the advertising payload⁹, and it can also scan advertising channels¹⁰ and get full access to the payload of received advertising packets¹¹.

On iOS, the BLE advertising functionalities offered to an app are limited. An app has not a full control of the advertising payload. However, an app can partially control the content of advertising packets; for instance it can advertise a service UUID by advertising the service¹² or spawning an iBeacon¹³. iOS allows an application to perform scanning¹⁴ and even though it does not provide full access to the advertising payload, it allows the app to retrieve data associated with the main element carrying data¹⁵. This is one of reason why the **Hybrid Model** has been considered.

ATT protocol functionalities required for the connected mode are available to applications on both Android and iOS. An app can connect to a peripheral on Android¹⁶ and iOS¹⁷. Similarly, exposing services to allow incoming connections is possible on both Android¹⁸ and iOS¹⁹.

4.2 Background limitations

Functionalities offered by the OS might be limited by the status of the application. If the previously listed functionalities can be used by an app running in foreground, the access to those functionalities can be removed or limited when the app is in background.

For instance, on iOS the BLE scan interval as well as the advertising interval may be increased while in background²⁰. An app running in background and advertising a service (for the connected mode) can only be discovered by other iOS devices.

Furthermore, experimental evaluations have shown that the behavior of background apps also depends on the status of the phone (sleep mode, screen off, ...) as well as on the phone model.

A possible solution to overcome those background limitations is to enforce that it remains in foreground (e.g. as a music player).

4.3 The Apple & Google Exposure Notification framework - GAEN

The GAEN framework, introduced by Apple and Google [1], offers to application, vetted by the two companies, functionalities to implement contact tracing.

An advantage of GAEN is that all the BLE operations are handled by the operating system. In particular, the GAEN framework take care of scanning the BLE channels and recording

⁸<https://developer.android.com/reference/android/bluetooth/le/BluetoothLeAdvertiser>

⁹<https://developer.android.com/reference/android/bluetooth/le/AdvertiseData.Builder>

¹⁰<https://developer.android.com/reference/android/bluetooth/le/BluetoothLeScanner>

¹¹<https://developer.android.com/reference/android/bluetooth/le/ScanResult>, <https://developer.android.com/reference/android/bluetooth/le/ScanRecord>

¹²<https://developer.apple.com/documentation/corebluetooth/cbperipheralmanager/1393252-startadvertising>

¹³https://developer.apple.com/documentation/corelocation/turning_an_ios_device_into_an_ibeacon_device

¹⁴<https://developer.apple.com/documentation/corebluetooth/cbcentralmanagerdelegate/1518937-centralmanager?language=objc>

¹⁵https://developer.apple.com/documentation/corebluetooth/cbcentralmanagerdelegate/advertisement_data_retrieval_keys?language=objc

¹⁶<https://developer.android.com/reference/android/bluetooth/BluetoothGatt>

¹⁷<https://developer.apple.com/documentation/corebluetooth/cbcentralmanager/1518766-connect>

¹⁸

¹⁹<https://developer.apple.com/documentation/corebluetooth/cbperipheralmanager>

²⁰https://developer.apple.com/library/archive/documentation/NetworkingInternetWeb/Conceptual/CoreBluetooth_concepts/CoreBluetoothBackgroundProcessingForIOSApps/PerformingTasksWhileYourAppIsInTheBackground.html

identifiers, and also handles the broadcast and periodic rotation of identifiers. Since those operations are not managed by the application, background status is not a limitation anymore. Similarly, it is not necessary for the app to have a full access to advertising payload.

In addition to those benefits regarding BLE communications, the GAEN framework enforces constraints on the contact tracing system, in particular on the flow of information. As a consequence, only application following an approach of DP3-T can use the GAEN framework.

5 Overview of existing implementations

Several BLE-based contact tracing applications have been created in reaction to the COVID pandemic. Some of those applications have been developed by country while others have been developed by researchers and technical consortiums. In table 1 we present a list of identified BLE contact tracing applications²¹.

Diverse technical choices have been made in those applications. Out of the 11 considered applications, 5 follow the **Broadcast Model**, 4 the **Connected Model**, and 3 the **Hybrid Model**. Furthermore, we can note that 4 of them are using the GAEN. Most applications support the two main platforms iOS and Android.

Table 1: List of BLE-based contact tracing application, with communication model, country.

System	Country	Model	Android	iOS	Comment
TraceTogether	Singapore	Connected	✓	✓	Based on BlueTrace [3]
SwissCovid ²²	Swiss	Broadcast	✓	✓	Apple-Google Framework
DP3T v1.0[18] ²³	-	Broadcast	✓	✓	
StopCovid ²⁴ [8]	France	Hybrid	✓	✓	
CovidWatch ²⁵	-	Hybrid	✓	✓	
NHS Covid App ²⁶	UK	Connected	✓	✓	
Covid Safe ²⁷	Australia	Connected	✓	✓	Based on BlueTrace [3]
Stopp Corona ²⁸	Austria	Broadcast	✓	✓	Apple-Google Framework
eRouska ²⁹	Czech	Hybrid	✓	✓	
Aarogya Setu ³⁰	India	Connected	✓		
Apturi Covid	Latvia	Broadcast	✓	✓	Apple-Google Framework
Corona-Warn-App ³¹	Germany	Broadcast	✓	✓	Apple-Google Framework

6 Extension of the broadcast model

Some contact tracing systems, may require the transmission of contact tracing data larger than what can be carried by an advertising packet (28 bytes). We present here a number of solution that can be used to increase the amount of data transmitted that can be transmitted with the broadcast model.

An overview of those extensions along with pros and cons is presented in Table 2.

6.1 Scan response

The BLE [6, Vol 6, Part B, sec. 4.4.2.3] features a scan response that can be leveraged to transmit additional information between an advertiser and a scanner [7]. When receiving an advertisement packet, a scanner can send a scan request to the advertiser to which the latter

²¹This list is based on the contact-tracing app inventory of Technology Review <https://www.technologyreview.com/2020/05/07/1000961/launching-mittr-covid-tracing-tracker/>

Table 2: Pros and Cons of BLE broadcast model extensions.

Extension	Pros	Cons
Scan response	- Adds 31 bytes of adv. data	- Not broadcast: an exchange is required for each device
Extended advertising	- Adds up to 254 bytes of adv. data	- Only supported by latest OS versions
Rotating payload (Carousel)	- Size of adv. data increased by a factor k	- Contact detection time linearly depends on k - Rotation frequency may be limited in background
Multi advertising	- Size of adv. data increased by a factor k	- Only supported on Android 5+ - Not supported by all chipsets

should answer with a scan response (see Figure 8). A scan response has a payload of 31 bytes and could thus increase the amount of transmitted data to 59 bytes.

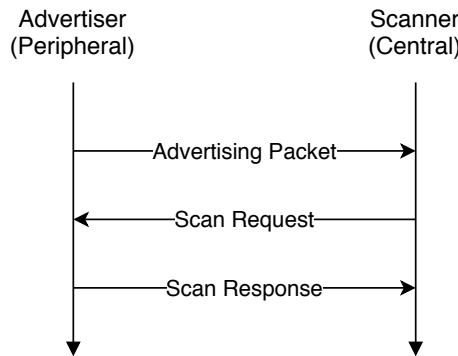


Figure 8: Scan request/response mechanism of BLE advertising.

One drawback of this approach is that the scan request and scan response packets are directed to a specific device, meaning that the information they carry is not broadcasted and will be only received by one device.

6.2 Extended advertising

The v5.0 of Bluetooth introduced the *Extended Advertising* feature, that allows advertising up to 254 bytes [6, Vol 6, Part B, sec. 2.3.4]. This extra space can be used to transmit larger contact tracing data.

This extended advertising feature is supported by latest Android versions³² and partially under iOS (only support extended advertisement payload up to 124 bytes)³³

6.3 Rotating advertising payload (Carousel)

Increasing the amount of transmitted data could be done by rotating the advertising payload periodically. With this solution, the contact tracing data is split into several blocks and each block is advertised one after the other in a carousel fashion [16] (see Figure 9). To retrieve the complete contact tracing data, it is necessary to receive all the blocks. The rotation frequency

³²https://source.android.com/devices/bluetooth/ble_advertising, see the method `isLeExtendedAdvertisingSupported()`

³³<https://developer.apple.com/videos/play/wwdc2019/901/>

will determine the duration necessary to receive all the blocks. This block rotation is triggered by the app. This rotation frequency can thus be limited by the background constraints of the OS.

A Forward Error Correction (FEC) coding [15] could be added to increase the efficiency of this scheme, and of any scheme splitting contact tracing data over multiple advertising packets.

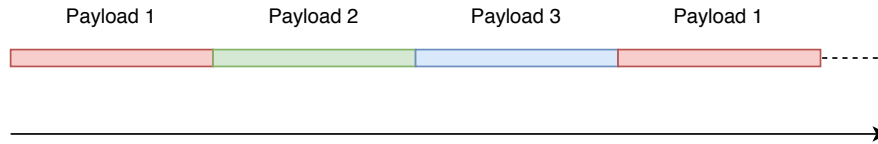


Figure 9: Carousel approach for advertising multiple advertising payload. Payloads are transmitted in sequential order, one after the other.

6.4 Multi-advertising

Simultaneously advertising multiple advertising payloads is a solution to increase the amount of data that can be transmitted. Using this approach multiple different advertising payloads can be advertised in parallel (see Figure 10). This feature, called *Multi-advertising*, is available on Android 5+ and allow to have multiple advertisement train running in parallel³⁴ and thus broadcasting an increased amount of data. This feature is not part of the Bluetooth specification, but can be seen as a device emulating several *peripheral* at the same time. Note that the support of Multi-advertising may depend on the Bluetooth chipset of the smartphone³⁵.

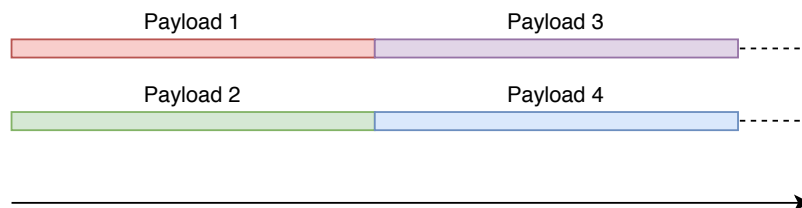


Figure 10: Multi-advertising approach for advertising multiple advertising payload. Multiple payloads are advertised in parallel.

7 Conclusion

Contact tracing can be implemented via BLE either following a **Broadcast Model**, a **Connected Model**, or a mix of them. BLE is supported on the two main mobile platforms Android and iOS, but the OS may restrain the use of BLE functionalities. The contact tracing introduced by Apple and Google can remove those constraints.

Size of advertising packets currently limits contact tracing systems based on the broadcast model to 25 bytes of useful data; however advanced BLE features offered by operating systems and the most recent Bluetooth specification could enable the transmission of larger amounts of data, opening the way for enhanced contact tracing protocols.

³⁴<https://stackoverflow.com/questions/35033013/what-is-bluetooth-le-multi-advertising>

³⁵<https://stackoverflow.com/questions/26482611/chipsets-devices-supporting-android-5-ble-peripheral-mode>

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