

Comments on BEREC's Draft Work Programme 2016

by the C² Coalition, October 2015

The Communications & Connectivity (C²) Coalition welcomes the opportunity to comment on the [BEREC Draft Work Programme 2016](#) (BoR (15) 140) (hereafter 'the Report'). Launched in July 2015, the C² Coalition is the voice for Internet enabled innovation and the policy framework that enables it, and hence represents what is now commonly branded as 'over-the-top' (OTT) service providers.

C² is notably interested in the work items below, and looks forward to collaborating with the BEREC on their elaboration/finalisation:

- a report on the migration to all-IP in the access networks;
- a report on the challenges and drivers of NGA roll out and infrastructure competition;
- a follow-up report or input paper on OTTs/CAPs;
- guidelines for the implementation of net neutrality provisions of the TSM regulation; and,
- a regulatory toolkit for NN QoS assessment and an opt-in quality monitoring system.

The C² Coalition regrets that the BEREC does not consult upfront on what stakeholders expect from the BEREC as building blocks for its next work programme. Currently, stakeholders only get a chance to give input once the details of the work programme have already been set out and agreed upon, leaving little to no room for adjustment and hence making the consultation process feel more like a procedural exercise rather than a substantial one.

WHAT IS STILL MISSING: NUMBERING

The C² Coalition remarks that numbering has been an element that has been missing from the BEREC's work programme for the past years, and would encourage the BEREC and National Regulatory Authorities (NRAs) to focus more of their attention to this area, **especially in light of the migration to an all-IP environment**, an issue which does appear on the BEREC Work Programme.

In the interest of European citizens and the European economy as a whole the BEREC and NRAs need to start today to put in place the building blocks of a forward looking numbering framework. Such a framework should focus on delivering choice and innovation to consumers, rather than sticking to obsolete principles, with the ensuing compliance issues.

The current Electronic Communications Framework requires a wider availability of numbers but no adequate enforcement mechanism has been put in place so far. The BEREC should make the numbering issue a priority in its efforts to improve regulatory consistency and harmonisation within the EU, and in

order to work on the [Recommendations](#) identified by the European Conference of Postal and Telecommunications Administrations' (CEPT) Electronic Communications Committee (ECC) Working Group on Numbering and Networks (WG NaN).

Though we realise numbering is not necessarily a BEREC core competence, the BEREC does look at the flaws/shortcomings of numbering in the context of IoT/M2M. These shortcomings could hence be looked at more broadly.

C² therefore urges the BEREC to swiftly adopt a vision that goes beyond what the Electronic Communications Committee (ECC), part of the European Conference of Postal and Telecommunications Administrations (CEPT), describes in its 2010 [Report](#) on the Evolution of Geographic Numbers (hereafter 'the ECC Report') as:

"The design of NGNs [Next Generation Networks] implemented today is very much 'PSTN on IP based networks' with the features and restrictions of the PSTN being copied." – p. 24

The ECC Report actually identifies multiple benefits associated to the removal of all constraints regarding geographic information in the numbering plan, namely (p. 17-19):

1. It would allow a more innovative use of geographic numbers;
2. It decreases the possible barriers of entry for new parties in the telephony market;
3. It gives consumers the option to keep their number when they are moving; and,
4. It allows a more efficient use of numbering resources.

The ECC Report also remarks that the removal of geographic information could have wider benefits than a mere efficiency increase, as it would also allow the introduction of wider area location portability, a possibility that is very appealing in a society where both businesses and individuals become more and more mobile (see p. 2 and 10).

The C² Coalition hence encourages the BEREC to look at numbering beyond the challenges of M2M, and to:

- Adopt numbering principles and plans that are user-centric (*i.e.* technology- and service neutral) and take into consideration the reality of a switch to an all IP environment;
- **Go down the same path of rethinking its approach to numbering and to take an approach that ensures the fullest possible retail price transparency and that removes the link between location information and geographic numbers;**
- Be supportive of innovative applications and consider that there should be a flexible approach that ensures the availability of numbering resources to cope with the needs of M2M applications; and,

- Reduce the sizes of the number blocks being allocated, which would have a positive impact towards lowering barriers to entry especially as regards smaller and innovative communications providers.

We thank you in advance for taking consideration of these views. Feel free to contact Herman Rucic, C² Coalition, by phone (+32 (0)478 966701) or email (hrucic@c2coalition.eu) should you need further information.

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About the C² Coalition

The Communications & Connectivity ([C²](#)) Coalition is the voice for Internet enabled innovation and the policy framework that enables it. Its current members are Google, Microsoft, Rakuten and Voxbone.

The C² Coalition believes that with the right public policies, Internet-enabled communications, services, applications and content, can benefit consumers, increase competition, provide a platform for innovation, drive broadband demand, and enable economic growth. The C² Coalition is [listed](#) in the Transparency Register.