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Comments on the Public Consultations on the Draft BEREC Report on Monitoring quality of Internet access services in the context of net neutrality

AFNIC Labs welcome the opportunity to comment the Draft BEREC Report Monitoring quality of Internet access services in the context of net neutrality.

AFNIC Labs have been contributing for years now to the Technical Working Group (WG) on active measurements of the Internet access, within ARCEP (the French Telecommunications and Internet Regulator). This WG's aim is to publish results comparing the various Internet Access Providers (IAP). The first published results are expected during Summer 2014.

On the other hand, AFNIC Labs are involved in the RIPE Atlas project. We host the second Atlas Anchor which was in operations, we are an Atlas sponsor, and we developed the Atlas tutorial for programmers which is given at RIPE meetings.

We highly appreciate the Draft BEREC Report as it is now. It will be an important document for all the NRAs and for all the people interested in Internet measurement. It is very clear, correct, well explained and comprehensive.

On most points, BEREC's principles are in full accordance to what AFNIC always asked for (see for example the AFNIC's reply to the public consultation by ARCEP on "Monitoring the quality of Internet access service on fixed networks" in 2012, which addresses several aspects put forward in the Draft BEREC Report: http://www.afnic.fr/en/about-afnic/news/general-news/5711/show/afnic-publishes-its-reply-to-the-public-consultation-by-arcep.html). Indeed we believe the following aspects are of key importance:

The importance of "low-level" metrics (such as latency and network capacity), often disregarded as too far from the actual user experience, but the only metrics that can be defined and measured scientifically (p. 3),

- The importance of openness, the use of free software for measurements, to allow cross-examination by all the parties involved (p. 3),
- The importance of open data, to allow interested third parties to check the aggregated results, and to make new analysis of thee data (p. 10),
- The importance of involving all the stakeholders (IAP, but also consumer organizations and technical experts), to build trust in the results (p. 13),
- The importance of following good scientific practices when publishing results: publishing the error margins, documenting the details of the measurement methodology (p. 9),
- The importance to rely on existing standards, already discussed and approved by the technical community, especially RFCs (p. 10 and 21).

On two points, we think the report could be improved:

- Deploying "shared test servers" is an ambitious project and it will take time, in any case (p. 5). The report should mention that, in the mean time, we could use existing systems, typically RIPE Atlas Anchors. Anchors are not a perfect fit (for instance, they cannot be used for network capacity testing) but they can have a role in some measurements.

- Stating that "a quality monitoring system by itself could motivate all parties to take a more net neutrality-friendly approach" (p. 6) is quite optimistic. In reality, it will depend on multiple aspects (notably actual competition of really different offers). In our opinion, the report should keep close to the facts and recommendations and try to avoid predicting outcome based on uncertain forecast.

We are not fully convinced that a "multi-NRA" system, as described in the report, is a realistic option but we commend the BEREC for having an ambitious vision on the future of measurements.

Moreover, we believe that while being federative and ambitious, it should be clear that this approach could be seen as a long-term target and in no case considered as a prerequisite framework for starting National ground actions, because if interpreted that way, it would push many NRA's into a collective "Wait" state.

Despite these small details, we support this report as it is and hope it will be widely distributed.