

Brussels, Belgium
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Subject: CENTR Board of Directors contribution

Public Consultation on draft BEREC Guidelines on implementation of net neutrality rules (06 June 2016)

We welcome BEREC's recognition of the importance of filtering to protect the security of internet services and users. However, while most types of filtering identified in paragraph 80 of the draft guidelines can be implemented in response to a particular threat to a network, this is not true for filtering to protect other networks from threats created by the filtering network's own users.

BEREC's draft guidelines identify one such class of filtering – spoofed addresses. This type of filtering can only be done by the networks that originate traffic (see more detail in [Jisc's statement](#)). The Internet Engineering Task Force has long considered it Best Current Practice against denial of service attacks, as documented in their BCP-38. This recommends that all networks be permanently configured to detect and block packets with spoofed source addresses, before they leave the originating network. This recommendation is promoted by network operators (for example the FENIX group in the Czech Republic) and regulators (for example FICORA in Finland). We are concerned that the draft regulations, by stating that permanent filtering should be considered a breach of network neutrality, would seriously harm these efforts to protect the security and stability of networks and services.

CENTR is the association of European country code top-level domain (ccTLD) registries, such as .de for Germany or .si for Slovenia. CENTR currently counts 53 full and 9 associate members – together, they are responsible for over 80% of all registered country code domain names worldwide. The objectives of CENTR are to promote and participate in the development of high standards and best practices among ccTLD registries. Full membership is open to organisations, corporate bodies or individuals that operate a country code top level domain registry.

For any additional questions regarding our response, please contact Peter Van Roste, General Manager of CENTR at peter@centr.org.

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