

DIGITALEUROPE Response to BEREC Net Neutrality Regulatory Assessment Methodology Consultation

Brussels, July 2017

KEY MESSAGES

As there are no clear standards in monitoring Internet access service (IAS) quality, traffic management practices and the definition, collection and validation of measurement datasets in scope with the open internet access regulation¹ and the BEREC guidelines on the implementation of European net neutrality rules², DIGITALEUROPE welcomes the consultation on the Net Neutrality Regulatory Assessment Methodology to provide guidance to National Regulatory Authorities (NRAs).

DIGITALEUROPE appreciates the work of BEREC in specifying a common measurement methodology and providing recommendations on various tools and guidance but would strongly recommend a mid-term goal of establishing industry-led standards on:

- The metrics required, their definitions, their implementations and the relevant results expected.
- The measurement methodologies by Internet Service Providers (ISPs), NRAs and end-users.
- The definition, collection, process and validation of the datasets.

There are multiple reasons for requiring such goal:

- A common understanding of the metrics, the measurement methodologies and the datasets irrespectively of the companies and research centres running the tests and providing the datasets
- A robust comparison in the information gathered between countries and over time as there are a growing number of tools and services provided by public and private sources
- A validation with network evolutions such as programmable networks and network slicing (shared or dedicated resources such as spectrum, wavelengths and bitstream) and dependencies on network elements (fixed/mobile + core, aggregation and access networks), devices, offers, locations and times

¹ Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25 November 2015 laying down measures concerning open internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union, <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R2120&from=EN>

² BEREC Guidelines on the Implementation by National Regulators of European Net Neutrality Rules BoR (16) 127 of 30 August 2016, http://berec.europa.eu/eng/document_register/subject_matter/berec/download/0/6160-berec-guidelines-on-the-implementation-b_0.pdf

This should be undertaken as a joint collaboration and common agreement among industry players and research centres in a standardisation body like the European Telecommunications Standards Institute (ETSI). It can be noted that ETSI and the International Telecommunication Union (ITU) have provided certain standardisations on parameters and technical methodology for performance measurement (ETSI (2005)³, ITU (2011)⁴). Also, the Internet Engineering Task Force (IETF) has already commenced projects called the Large-Scale Measurement of Broadband Performance (LMAP)⁵ and IP Performance Metrics⁶.

³ European Telecommunications Standards Institute (ETSI) (2005), “ETSI EG 202 057-4 V1.1.1 Speech Processing, Transmission and Quality Aspects (STQ); User related QoS parameter definitions and measurements; Part 4: Internet access” www.etsi.org/deliver/etsi_eg/202000_202099/20205704/01.01.01_60/eg_20205704v010101p.pdf

⁴ International Telecommunication Union (ITU) (2011), “ITU-T Y.1540 Internet protocol data communication service – IP packet transfer and availability performance Parameters”, www.itu.int/ITU-T/recommendations/rec.aspx?id=9270

⁵ Internet Engineering Task Force (IETF) Scale Measurement of Broadband Performance (LMAP) <https://datatracker.ietf.org/wg/lmap/about/>

⁶ Internet Engineering Task Force (IETF) IP Performance Metrics <https://datatracker.ietf.org/wg/ippm/about/>

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DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 60 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

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