



ECTA RESPONSE

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BEREC Report on

IP-Interconnection Practices in the Context of

Net Neutrality

5 JULY 2017

1. INTRODUCTION

ECTA, the European Competitive Telecommunications Association, representing over 100 challenger telecoms operators and digital communications companies, welcomes the opportunity to comment on this BEREC consultation, and hereby provides its brief comments, addressing matters of principle.

2. COMMENTS

ECTA has consistently pointed out the prominent role that competition and transparency play in net neutrality issues. Hence, effective and sustainable competition, transparency and ease of switching should be promoted. Therefore, when investigating traffic constraints, competent authorities should guarantee appropriate transparency towards parties involved and consumers. More particularly, the consequences of adopting specific IP interconnection practices for consumers should be clearly identified and made public.

ECTA supports a competitive Internet ecosystem where end-to-end connectivity is unconstrained, free Internet access and usage for end users is safeguarded, without any gatekeeping by ISPs terminating traffic at end user equipment that might be in violation of interconnection principles, net neutrality regulation or competition law.

Moreover, ECTA would suggest that BEREC explain how this initiative relates to the Net Neutrality Regulatory Assessment Methodology currently being consulted on and how IP interconnection practices might impact the measurement results.

Considering the fast evolution of the Internet ecosystem and the continued increase in traffic volumes, ECTA would recommend BEREC to publish reports on evolving IP interconnection practices on a more regular basis, for example, annually, but no later than every other year. These reports should preferably also cover the commercial elements (costs, pricing) of IP interconnection options – e.g. IP Transit, (paid) peering - with the objective to ensure whether there are impediments to competition and consumer choice.

Finally, ECTA would welcome a more European centric approach for future reports.