

From: [REDACTED]
To: [NTP_Guidelines](#); [NTP_Guidelines_Notifications](#)
Subject: Contributions on the draft Guidelines
Date: Thursday, 21 November 2019 03:13:58

First, I would like to thank BEREC for asking for public feedback. I think the draft BEREC Guidelines is going in the right direction. Large parts of the analysis and conclusion match my experience.

Point A as the NTP is the option that, by far, makes most sense from a customer and technological perspective. However, I also see two possible ways to improve it

First, make point A as NTP location the default recommendation for NRAs. BEREC should work towards a common understanding of this position by NRAs in the EU.

Second point, please consider end-user necessities. A whole section deals with the impact of the discussed NTP locations on network operators and ISPs, however requirements of end-users are not taken enough into account. Freedom of choice, digital sovereignty, and independence from ISPs are fundamental values that are also covered by Regulation 2015/2120 and Directive 2008/63/EC.

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