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**From:** [REDACTED]  
**Sent:** Thursday, November 21, 2019 2:00 AM  
**To:** NTP\_Guidelines; NTP\_Guidelines\_Notifications  
**Subject:** Feedback for NTP Guidelines

Dear sir or madam,

Thank you for accepting public opinions on the document about NTP guidelines. I am just a single end-user but I still want to express my thoughts about that topic.

In paragraph 3.2.2 / 39 you write that when the NTP is in point B, the impact on the router is the same as if the NTP was in point A. I believe that this is not the case. Internet service providers (ISPs) do not use separate devices for modem and router. They use one single box that contains modem and router. In Germany, the NTP is currently in point A but setting the ISP-provided router/modem box to bridge mode is, at least in my case, not straight-forward and requires contacting the ISP. Depending on the implementation, it might be hard or impossible for end-users to use their own router because the combined modem/router boxes might no allow to bridge the network. It might happen that a internet service provider charges extra for getting a modem without the integrated router functionality. In that case, the end-user's ability to buy devices matching their needs is significantly limited.

In paragraph 3.3.4 you write about data protection implications. There is another important implication: If the NTP is in point C (or maybe also if it is in B), end-users probably have to pay extra to get another device that meets their individual needs. Because the end-users have no choice and have to rent the devices from the ISPs, the ISPs can basically charge whatever money they want. There are end-users who care about data privacy and do not want to upload their photos to big companies from overseas. In Germany, there currently is the possibility of self-hosting the data by buying consumer oriented network attached storage devices that are easy to set up. In case the ISPs do not allow to adjust firewall rules in their routers or charge extra for getting a router that is capable of adjusting firewall rules, the possibilities to protect private data from big companies are limited. End-users might need to fall back to uploading their data to big companies because that is cheaper than paying the rent for a different router. In my personal case, renting a router with the possibility to configure the firewall gets more expensive than buying a router yourself within not even a year. Companies that allow users to access their data from everywhere are usually located outside of the EU. "Who has the data has the power" (Günther Oettinger), so we give power out of our hands by making it expensive for end-users to host their data themselves.

Adding more complex network structures in end-user's networks might be impossible in case the NTP is in point C. For example, when having another router with its own subnet, the ISP provided router needs to accept router advertisements. If the ISP decides that they do not want to support specific features like this, customers can get into trouble when trying to set up their network. In general, if the NTP is in point C, the freedom of users to buy their own hardware for hosting or networking gets limited significantly or, depending on the ISP, significantly more expensive.

Best regards,  
[REDACTED]