From:

Sent: Thursday, November 21, 2019 10:16 AM

To: NTP_Guidelines; NTP_Guidelines_Notifications

Subject: Guidelines on CommonApproaches to the Identification of the Network TerminationPoint in different Network Topologies (BoR (19) 181

Hello,

I strongly side with the FSFE's position regarding "Guidelines on CommonApproaches to the Identification of the Network TerminationPoint in different Network Topologies (BoR (19) 181":

For reasons of freedom of choice, privacy and data protection, compatibility, fair competition, and security, end-users have to have the possibility to use an own telecommunications terminal equipment (TTE). This will only be freely possible if the network termination point (NTP) is at point A. Therefore, we strongly recommend BEREC to set the NTP at point A as the preferred policy and thereby establish and protect Router Freedom in Europe.

[...]

Furthermore, we recommend BEREC to consider setting the NTP at point A as the default recommendation for all European NRAs. Neither end-users nor ISPs nor equipment industry would profit from a patchwork rug of different NTP locations. Instead, a European-wide Router Freedom would allow for a larger degree of innovation, fair competition, and security in Europe.

Cheers,

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