From: ████████████████

Sent: Thursday, November 21, 2019 3:08 PM

To: NTP_Guidelines; NTP_Guidelines_Notifications

Subject: Input for the BEREC's guidelines on Router Freedom in Europe

End-users should have the possibility to use and own telecommunications terminal equipment (TTE), which is only possible if the network termination point (NTP) is at point A. I believe there to be no technical merit in having ISPs owning TTE as there is little evidence to see how currently user owned or provided TTE present any technological harm or damage to ISPs and other customers.

On 3.2.1: Fixed NTP is located at point A Routers and modems carry all of the user's sensitive information and online activity, it is therefore essential that the user is allowed access to a device that can provide necessary security features and safe hardware in order to guarantee the safety of their information.

Users should be allowed to use devices that provide the required features and equipment for their individual requirements. This is pertinent to people who may run home businesses or require the use of enterprise networking equipment.

On 3.2.3: Fixed NTP is located at point C Allowing users to use their own TTE encourages fair competition, a widespread deployment of ISP provided TTE would cause a lack in competition between the commercial TTE vendors, and encourage a monoculture. This lack of diversity presents serious issues regarding security vulnerabilities, if a single widespread ISP provided TTE suffers from a vulnerability, a huge number of users will be affected. Unfortunately many high volume manufactures are very slow at providing essential updates, often not updating them at all. Having more CPEs available benefits the general security of the network, through diversity of software and hardware, as well as allowing end-users to take their own security precautions.

On 3.3.5.3: Fixed NTP is located at point C The scope of problems introduced by having the NTP at point C, in that local traffic in the case of the modem and router now being part of the public network, is vast. The ramifications of having all private network traffic now have to pass through a public network effectively removes the concept of the private network.

In conclusion:
This response was unfortunately written in an incredibly short time, but the Free Software Foundation Europe (FSFE) has written a far better response than this and I hope that it is, in at least some part, taken into consideration.

https://download.fsfe.org/policy/routers/20191121-BEREC-Guidelines-Consultation.pdf