
From: [REDACTED]
Sent: Thursday, November 21, 2019 5:00 PM
To: NTP_Guidelines; NTP_Guidelines_Notifications
Subject: Opinion on: BEREC Guidelines on Common Approaches to the Identification of the Network Termination Point in different Network Topologies

Dear BEREC,

On 3.2. - NTP has to be located at point A since that would allow more competition and grow a market of services and products that user can choose from to enhance their internet connectivity and security of it. But more importantly NTP has to be located at point A because of the reasoning below.

On 3.3.3. - Current document lacks analysis of a very important security aspect. Having foreign hardware on customer premises, may seriously impact security of the customer. Firstly, many of modems and routers contain built in radios (802.11 and 802.15) which combined with remote management capability of ISP-owned devices might enable ISP spying on the data being transmitted over radio on customer premises that has no relation to the network of the ISP. Secondly, customer has no control over power consumption of the device which is especially important with regard to climate change and need to lower power consumption. If customer and not the ISP is paying for the power, ISP is disincentivized to provide modern power-efficient devices. These cannot be overlooked and have to be included as considerations. In summary, customer has to always have the possibility to opt to position NTP at point A.

Kindly,

[REDACTED]