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**From:** [REDACTED]  
**Sent:** Thursday, November 21, 2019 6:24 PM  
**To:** NTP\_Guidelines; NTP\_Guidelines\_Notifications  
**Subject:** Public consultation on draft BEREC Guidelines on common approaches to the identification of the network termination point in different network topologies

Dear Sir,

Thanks first of all to organize this public consultation on terminal equipment required to access the public internet, also known as "modems" or "routers".

Over the last 20 years, I have worked on FLOSS software projects which "controls" those consumer routers, such as cable modems, ADSL modems, or just simple routers.

You will find an extensible list of my contributions through my personal website:

[REDACTED]

I have wrote custom software and adapted existing FLOSS and non-FLOSS software for widely deployed VDSL modems in Belgium, such as the Belgacom Box 1, 2, 3 and 3+.

In 2010, I found several severe security flaws in the BBOX2 (open wifi, open telnet, same publicly known login+password on all those boxes), where malicious users could get an administrator shell on the router from the street.

This vulnerability was most probably used to gather thousands of PPP credentials from end users around Brussels:

<https://www.lalibre.be/belgique/vendetta-le-hacker-de-belgacom-interpelle-51b8b387e4b0de6db9b924b7>

I made a presentation of my findings at a security conference Hackito Ergo Sum in Paris, and Belgacom was notified at the time of the security flaws:

[REDACTED]

But it took them more then 2 years to fix those obvious security problems, despite my communications with their security experts decorated with many certifications on its LinkedIn profile.

My conclusion is that we cannot trust some third parties, such as ISPs, to have the control of the software in our homes, as it creates an insecure point in the network which is being used by malicious actors to spy on users, compromise their privacy, and spread malware such as miners.

It is why I urge you to refuse any pressure from the ISPs to put their dirty hands on our routers located in our homes.

Best regards,

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[Redacted signature]

Web: [Redacted]

FFII.org Brussels

"In July 2005, after several failed attempts to legalise software patents in Europe, the patent establishment changed its strategy.

Instead of explicitly seeking to sanction the patentability of software, they are now seeking to create a central European patent court, which would establish and enforce patentability rules in their favor, without any possibility of correction by competing courts or democratically elected legislators."