



RIPE NCC
RIPE NETWORK COORDINATION CENTRE

BEREC Consultation

Identification of the network
termination point

What Is This About



- Body of European Regulators for Electronic Communications (BEREC)
 - Assists the European Commission and national regulatory authorities (NRA) with implementing the EU regulatory framework
 - Publishes guidelines alongside directives and regulations to ensure a consistent application and explanation of the rules
 - It regularly seeks feedback on draft guidelines via public consultations

The Network Termination Point



- The new European Electronic Communications Code (EECC), Directive (EU) 2018/72 defines the NTP in article 2(9):
 - *“NTP’ means the physical point at which an end-user is provided with access to a public communications network; in the case of networks involving switching or routing, the NTP is identified by means of a specific network address, which may be linked to an end-user’s number or name.”*
- BEREC is drafting a guideline to further specify how to interpret this text
 - In particular, whether the equipment is part of the NTP or not

Net Neutrality



- Regulation (EU) 2015/2120 in article 3(1) states:
 - *“End-users shall have the right to access and distribute information and content, use and provide applications and services, **and use terminal equipment of their choice**, irrespective of the end-user’s or provider’s location or the location, origin or destination of the information, content, application or service, via their internet access service.”*
- The 2016 BEREC Guidelines on net neutrality added to this:
 - NRAs should assess whether the ISP allows users to chose their own equipment
 - “Obligatory equipment” is only allowed if there are objective technical reasons
- National approaches vary on implementation and enforcement

The Current Consultation



- The key question is whether your modem is part of the NTP
 - When it is, it becomes part of your providers network
 - When it isn't, it becomes your problem
- Draft guidelines lays out the different options
 - It describes some of the consequences of the choices
- It goes into more details about “objective technical reasons”

We (You) Can Provide Input



- As the RIPE NCC we have no particular opinion on this
 - There are benefits and downsides to all approaches
- It could have an impact on our engagement strategy on topics such as IPv6 deployment and IoT security
 - Who makes the decision to deploy a particular technology?
 - At which speed can we expect technology or updates to be deployed?
- It might also change the perspective on regulation
 - Mandatory certification of equipment to protect the consumer?

What Do You Think?



- We are happy to provide our input on behalf of RIPE
 - Based on rough consensus in this Working Group
- We invite you to discuss and draft an opinion
 - Is there any harm in the proposed guidelines?
 - What do you think is the best way moving forward?
 - Any feedback on the technical criteria laid out?
- If there is no consensus, we will not submit a response
 - You can always submit a response on your own behalf



https://berec.europa.eu/eng/document_register/subject_matter/berec/regulatory_best_practices/guidelines/8821-berec-guidelines-on-common-approaches-to-the-identification-of-the-network-termination-point-in-different-network-topologies



Questions



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