



Access Now's written submission for the BEREC stakeholder dialogue on Net Neutrality

Brussels, 16 December 2015

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Key recommendations

- Rules on traffic management and its exceptions, in particular regarding congestion management, must be clarified to avoid abuses and ensure agnostic treatment of traffic.
- Specialised services criteria must be based on technical, not commercial, considerations, and ensure compliance with the objective of the Regulation to safeguard access to the open internet.
- Commercial practices such as zero rating limiting users' right to freedom of expression and of communication must be prevented.
- Specific and verifiable information on the transparency obligation and the use of monitoring techniques must be provided.

Introductory statement

Dear Chair,

Dear members of the Body of European Regulation for Electronic Communication working group,

I would like to first thank you very much for the opportunity given to Access Now to share our views, comments, and concerns on the Telecoms Single Market Regulation with you. We hope the meeting held on 15 December will be the first of a long series of hearings and stakeholders' consultations organised during the next nine months where even more civil liberties organisations, academics, and researchers will be able to provide valuable input as you establish the guidelines that will determine the future of Net Neutrality in the European Union.

Access Now is an international organisation that works to defend and extend digital rights of users globally. Through representation in 10 countries around the world – including presence in the European Union - Access Now provides thought leadership and policy recommendations to the public and private sectors to ensure the internet's continued openness and the protection of fundamental rights. Access Now wields an action-focused global community of nearly half a million users from over 185 countries, and also operates a 24/7 digital security helpline that provides real-time, direct technical assistance to users around the world.

Access Now has been working on the Telecoms Single Market Regulation since its introduction in 2013, providing analysis to lawmakers in the European Commission, Parliament, and the Council. The intention of the legislators with this Regulation was clear. From Commission to Council, representatives have repeatedly expressed their willingness to protect and guarantee the openness of the internet. Unfortunately, loopholes undermining this objective could find refuge in the vagueness of the text and the legislators have decided to leave it up to you to give meaning to this text. We look forward to working with you in clarifying the four elements that need to be addressed.

- Rules on traffic management and its exceptions, in particular regarding congestion management, must be clarified to avoid abuses and ensure agnostic treatment of traffic.
- Specialised services criteria must be based on technical, not commercial, considerations, and ensure compliance with the objective of the Regulation.
- Commercial practices limiting users' right to freedom of expression and of communication must be prevented.
- Specific details on the transparency obligation and the use of monitoring techniques must be provided.

With this, users in the European Union will enjoy unfettered access to the whole internet, a platform for the enjoyment and fulfillment of human rights online, and fostering creation and innovation for anyone, anywhere, regardless of geographic location or type of device being used. The internet was created open and neutral, and limiting its capacity or its access would limit its beneficial societal impacts.

We have prepared detailed answers to the questions distributed focusing on these four areas, partly presented at the 15 December meeting. We look forward to future discussions to fully address all issues pertinent to the future of the internet.

Thank you very much.

Estelle Massé
Access Now Policy Analyst

Answers to questions provided by BEREC

Topic 1 – Traffic management for Internet access services (IAS)

- **“Categories of traffic” and similar terms**

What is your understanding or view on the terms “specific categories of traffic” and “specific content, applications or services, or specific categories thereof” in Article 3(3) subparas 2 and 3?

According to Article 3(1) of the Regulation and several public statements from the EU Commission, Council of the EU and Parliament, the objective of the legislators is to ensure the equal treatment of *all* traffic and thus avoid discrimination based on types of traffic. This objective is further established under Article 3(3) subparagraph 1 where the Regulation lays down that “Providers of internet access services shall treat all traffic equally” and under subparagraph 3 where the rule explicitly prohibits network discrimination based on “specific content, applications or services, or specific categories thereof”.

As a general rule, providers of internet access cannot look into the traffic to prioritise some applications or services over others. For instance, Internet service providers (ISPs) cannot slow down one VoIP service over another or block all video traffic. Access to all end-points must remain available as established under recital 4.

There is however a point of incoherence in the text when referring to “specific categories of traffic” in Article 3(3) subparagraph 2 as it foresees traffic management measures to be based “on objectively different technical quality of service requirements of specific categories of traffic”. This provision comes after the general provision for all traffic to be treated equally and aims at ensuring, as clearly stated in the article and recital 9, that traffic management practices are not commercially based.

The language chosen to fulfill this objective is unfortunately confusing and should be interpreted in a way that ensures that the legislators’ objective for agnostic treatment is delivered. Therefore, “objectively different technical quality of service requirements” should be understood as “objective requirement of traffic”. This interpretation would enable ISPs to manage traffic to “efficient use of network resources and to an optimisation of overall transmission quality”, as required by the Regulation, without the use of commercial criteria.

- **Reasonable traffic management (TM)**

In your view, how can day-to-day “reasonable” TM measures performed by ISPs in accordance with Article 3(3) subpara 2, such as TM for “specific categories of traffic”, affect the end user’s choice? It would be helpful if you can provide concrete examples.

Pending the clarification from the previous point, day-to-day “reasonable” traffic management measures should not affect end-users’ choice as they are conducted to ensure users enjoy access to all internet endpoints at the quality and speed established in their contract. Under “reasonable” traffic management, the ISPs will put in place measures for the optimal functionality of the network, thus benefitting users. ISPs cannot conduct practices that would limit users’ rights to access or deliver content by either blocking, altering, slowing down, or throttling access to any specific or all applications, content, or services as indicated on Article 3(3).

• **TM going beyond reasonable TM**

In your view, how can TM measures “going beyond reasonable” TM performed by ISPs in accordance with Article 3(3) subpara 3, e.g. “congestion management”, affect the end user’s choice? It would be helpful if you can provide concrete examples.

As observed by BEREC in the 2012 guidelines on Net Neutrality, any deviation beyond reasonable traffic management is to be defined as “restricted access to the internet”.

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Those practices, where an application can be slowed down or its access restricted, affect users’ choice through interferences in the network that are by default prohibited. At that point, access to all end points over the internet might not be guaranteed, limiting users’ freedom of communication. For instance, if an ISP is throttling all VoIP services, users’ experience of these services can become unsustainable and force them to use an alternative service that is not being discriminated, such as regular phone network instead of those services. Blocking of legal websites, applications, or services by ISPs has a direct and obvious impact on the freedom of expression and information.

It is therefore of the utmost importance that the criteria established in the text are respected as these measures interfere with users’ rights established in Article 3.1. Article 3(3) subparagraph 3 of the Regulation clearly establishes that traffic management measures “going beyond reasonable” can only take place for limited period of time - “only for as long as necessary” - and to comply with the three exceptions foreseen by Article 3(3) point a,b and c of the Regulation.

In the exceptions foreseen for traffic management, clarification on the use of traffic management measures for congestion management would be needed. As explained by BEREC in the 2012 guidelines on Net Neutrality, “congestion may occur in two different ways, either related to unpredictable situations occurring on an irregular basis, or relatively frequently caused by an operator’s failure to meet increased traffic load with sufficient capacity enhancement.”²

¹ BEREC Guidelines for Quality of Service in the scope of Net Neutrality, 29 May 2012, p.4.
http://berec.europa.eu/files/news/bor_12_32_guidelines.pdf

² BEREC Guidelines for Quality of Service in the scope of Net Neutrality, 29 May 2012, p.45.
http://berec.europa.eu/files/news/bor_12_32_guidelines.pdf

The frequent, recurring congestion is addressed by the Regulation in the last part of recital 15 where the text specifies that “recurrent and more long-lasting network congestion [...] should rather be tackled through the expansion of network capacity.” Ideally, ISPs would engage in efficient network planning, expanding network capacity to properly respond to user's growing need. However, even in those cases, congestion might still happen.

The Regulation then foresees two scenarios for congestion to take place: “impending congestion” and “temporary and exceptional congestion”, both defined under recital 10. The second scenario - temporary and exceptional congestion - is described as unpredictable congestion which requires immediate and temporary intervention in the network. This scenario, also envisaged by BEREC, corresponds to a situation “when traffic increases to a level where routers run out of buffer space and are forced to start dropping some IP packets.”³

The meaning of “impending congestion” is however less evident. It is referred to as situation “where congestion is about to materialise”. This could refer to cases when a large event, such as the final of the World Cup or the Eurovision, is taking place and ISPs are expecting a peak in users. In that case, even if both the hosting services and the ISPs can anticipate high traffic and improve the caching on website, congestion might still happen. However, such scenarios can be addressed under the Regulation through congestion management for “temporary congestion”. It is therefore unclear what additional scenarios traffic management for “impending congestion” would be tackling.

We however recall that these unclear provisions allowing traffic management measures to prevent congestion about to materialise can only take place for “only for as long as necessary” and only occur in “temporarily or in exceptional circumstances”. This means that ISPs cannot abuse this clause to constantly manage their network and therefore avoid a needed upgrade of their infrastructure.

Topic 2 – Specialised services (SpS) vs. IAS

• SpS and necessity to meet requirements for a specific level of quality

Article 3(5) subpara 1 refers to providing SpS where “the optimisation is necessary in order to meet requirements ... for a specific level of quality”. What could be the reason for implementing or offering SpS? In your view, are SpS necessary for offering existing or new services?

• SpS vs. content and applications provided over IAS

Are you aware of a demand for SpS from end users (including business users)? In your opinion, could content and applications provided on the IAS become a kind of SpS? How should this be assessed under the TSM regulation?

³ BEREC Guidelines for Quality of Service in the scope of Net Neutrality, 29 May 2012, p.6.
http://berec.europa.eu/files/news/bor_12_32_guidelines.pdf

If they were allowed, would you see demand for, or benefit to, end users from the provision of sub-Internet offers (i.e. offers where the access to Internet is restricted to a limited set of content and applications)? How should think such offers should be assessed under the TSM regulation?

• **SpS effect on innovation and openness of the Internet**

Do you have a view on the impact of the possibility to provide SpS on future innovation and the openness of the Internet? Do you see any issues arising with the provision of SpS to end users?

Access Now will provide answers to these three questions, jointly.

Specialised services, defined under recital 16 of the Regulation as electronic communication services that cannot be offered over the best effort internet and require optimisation, refers to innovative services. Current examples of those services could be e-health or connected car applications which require a stable and fast connection that cannot be assured over the internet. The development of such services is still new and more examples might come in the next years. While it is hard to determine how much of tomorrow's online innovation would fall under the specialised services category, the developments of these offers triggered the need for legislators to regulate access to those services in the Regulation.

Regarding the demand for specialised services, data on market penetration of IPTV applications globally indicate the general growth rate for subscription has declined, meaning that the number of subscribers has increased at a slower rate since 2012 as compared to 2011.⁴

Regarding the demand of sub-internet offers, as indicated in your question, such offers are not allowed under the Regulation. These schemes limit user access to services and applications chosen by tech and telecom companies, not by the users. This results in network discrimination, in which users are delivered access to some, but not all, of the internet, resulting in unequal access — the very opposite of Net Neutrality. Net Neutrality lies at the very core of the internet's potential for development and the exercise of rights. This concept can be elaborated into three principles: First, the end-to-end principle, which ensures that all points in the network should be able to connect to all other points in the network. Second, the best-effort principle which guarantees that all providers of the internet should make their best effort to deliver traffic from point to point as expeditiously as possible. Last but not least, the innovation without permission principle, which states that everyone should be able to innovate without permission from anyone or any entity. These principles are encompassed in the Regulation, in particular in Article 3(1) which establishes:

⁴ IPTV Statistics - market analysis - Q1 2013, p. 3 & 4.

<http://point-topic.com/wp-content/uploads/2013/02/Point-Topic-Global-IPTV-Statistics-Q1-2013.pdf>

“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.”

Free expression and access to information depend on access to the full, unfettered internet; anything less harms users’ rights. Sub-internet offers like Internet.org - whose programme is now called Free Basics - led by Facebook provide users access to a handful of selected internet-connected services and applications. The programme has launched in several developing countries, including India, the Philippines, Ghana, and Colombia. The terms of service of the deal indicates that

“whenever [users] request access to a website or service, [internet.org] may modify that request and route it through our servers”.

Not only is such provision a clear violation of Net Neutrality, as it implies interfering with the normal traffic in the network, it also puts users’ privacy at risk as access by government agencies is greatly simplified if data flows through and/or is stored by a single actor.

In Paraguay where the programme was launched recently, users reacted by creating a “tunnel” establishing a link to the unrestricted internet, circumventing the lock-in.⁵ This reaction shows the importance of being able to access the whole internet for users which is confirmed in BEREC’s report on how consumers value the net. This report found that internet users consider it “mission-critical” to have access to the internet and focus their demand on “high-speed broadband performance, continuous availability, value for money and rich online user interactivity and experience.”⁶

While the delivery of specialised services is allowed under the Regulation, it is of the utmost importance to ensure that online services, which can be delivered over the internet and whose characteristics do not correspond to a specialised service, are not offered as one; otherwise ISPs would be conducting price discrimination practices. We share BEREC's concerns expressed in the 2012 guidelines for Net Neutrality that price discrimination practices offering access to a limited part of the internet would have a negative effect on consumers' rights as it could make switching more complicated, would limit users' freedom

⁵ Motherboard. This App Lets You Piggyback Facebook's Free Internet to Access Any Site, 16 March 2015. <http://motherboard.vice.com/read/this-app-lets-you-piggyback-facebooks-free-internet-to-access-any-site>

⁶ BEREC report on how consumers value the net. Annexe 1 produced by PWC, 13 February 2015, p.4. berec.europa.eu/eng/document_register/subject_matter/berec/download/1/5024-berec-report-on-how-consumers-value-net-_1.pdf

to impart information on the whole internet and would negatively distort the market by commercial differentiation between services.⁷

Allowing offers that would chop the internet into pieces and provide access to some but not all the services, content, and applications available online, inherently contradicts the objective of the Telecoms Single Market Regulation and would severely harm users' freedom of choice and access to information, and right to receive and impart information. Nothing in this Regulation can be interpreted in a way to allow online services to be offered as specialised services or allow offers of "bits of internet".

To avoid this possible abuse, in 2012 BEREC defined specialised services as "Specialised services are electronic communications services that are provided using the internet protocol and operated within closed electronic communications networks. These networks rely on admission control and they are often optimised for specific applications based on extensive use of traffic management in order to ensure adequate service characteristics."⁸

This definition is similar to the rule laid down on Article 3(5) of the Regulation and matches the objective of the Regulation of safeguarding non-discriminatory access to all internet endpoints.

Topic 3 – IAS quality and implications

• **Transparency regarding traffic management**

What information would be beneficial for end users so that they are better informed, e.g. regarding traffic management measures, commercial and technical conditions and their impact on Internet access services? How should this information be communicated to them in the contract? (Ref. Article 4(1))

From a user perspective, the information provided regarding traffic management practices should be clear, verifiable and concrete to ensure it is understandable. Examples should be provided of how measures applied on the network can temporarily affect their internet access.

Already in 2011, BEREC has identified the characteristics that constitute an effective transparency policy in the context of Net Neutrality.⁹ For this, several actors, including the NRAs and the ISPs, should be involved to develop a policy that would "uphold accessibility, understandability, meaningfulness, comparability and accuracy". On the issue of traffic management specifically, we support BEREC views that ISPs should use common

⁷ BEREC Guidelines for Quality of Service in the scope of Net Neutrality, 29 May 2012, p.18. http://berec.europa.eu/files/news/bor_12_32_guidelines.pdf

⁸ BEREC Guidelines for Quality of Service in the scope of Net Neutrality, 29 May 2012, p.27. http://berec.europa.eu/files/news/bor_12_32_guidelines.pdf

⁹ BEREC, Guidelines on transparency in the scope of net neutrality: best practices and recommended approaches, 2011, p. 3 & 4. http://berec.europa.eu/doc/berec/bor/bor11_67_transparencyguide.pdf

terminology to help make information more comparable and easier to understand by end users. Overall, users should always be informed of the possible impact of the use of reasonable traffic management practices on their internet access services. For instance, it is important to ensure that all services, content, and applications remain available when reasonable traffic management to improve functioning of the network is applied. With this information, users will be able to better detect if discrimination in the network takes place. Information regarding possible traffic management practices going beyond reasonable should clearly state that these interferences with the network will be for a limited time, used on a necessary and proportionate basis, and are in place for a specific purposes. NRAs should work with ISPs to explain in clear language the three exceptions laid down in Article 3(3) point a, b, and c of the Regulation that justify the limited use of traffic management practices beyond reasonable. Finally, easy access to remedy mechanism in case of ISPs non compliance with the agreed terms should be available for users.

- **IAS quality – speed**

How should ISPs describe and communicate speed of their IAS offers in the case of fixed and mobile networks? How should the different IAS speed parameters (e.g. minimum, maximum, advertised and normally available speeds in the case of fixed networks and estimated maximum and advertised speeds in the case of mobile) be defined in the contract? (Ref. Article 4(1)(d))

Regarding the internet access services' speed, ISPs should indicate to the user the normally available speed it will get on its fixed connection and the average speed in case of mobile connection. Minimum assured speed and maximum possible speed should also be communicated in the contract. This information could be provided through a diagram or image for ease of reading. To avoid confusion, the maximum available speed should *NOT* be displayed in a way that the user would assume it is the normally available speed. More specifically, based on BEREC recommendation in 2011, users would benefit from verifiable information regarding the actual download and upload speeds and the difficulties that may impact their provision.¹⁰

- **IAS quality – other parameter**

How should ISPs describe other parameters of their IAS offers, such as quality of service parameters (typically latency, jitter, packet loss) and quality as perceived by end users? Should these parameters be defined in the contract? If so, how?

Information on the quality of services parameters such as latency, jitter, and packet loss, should be provided in clear and easy to understand language in the contract. A concrete example should be provided to help users understand the practical impact on their

¹⁰ BEREC, Guidelines on transparency in the scope of net neutrality: best practices and recommended approaches, 2011, p. 4. http://berec.europa.eu/doc/berec/bor/bor11_67_transparencyguide.pdf

internet access service. For instance, information regarding possible issues during the use of VoIP applications such as videos delays or sounds effects could be provided.

Topic 4 – Commercial practices/zero-rating and misc.

- **Commercial practices applied to the IAS offers**

What is your understanding of the term “commercial practices” (Ref. Article 3(2))? Do you think there is a demand for “commercial practices” such as zero-rating, from the end users’ point of view?

If zero rating is to be understood as a “commercial practices” referred to in Article 3(2), then this practice is prohibited under the Regulation. Article 3(2) and recital 7 establish that “commercial practices” cannot “limit the exercise of [users] rights and thus circumvent provisions of this Regulation safeguarding open internet access”.

The Regulation sets further rules that would indicate the prohibition of zero rating practices. First, article 3 by its title and recital 3 describes internet as an “open platform” and encompasses the general objective of the Regulation to “safeguarding the open internet access, “ensure the openness of the internet”. However, zero rating offers, either by providing access to only specific content contradict the core principles of the openness of the internet.

Zero rating by its nature limits users’ freedom to receive and impart information recognised under Article 3(1) of the Regulation. Zero rating limits access to only a specific set of services and applications selected by the ISPs, therefore actively preventing access to all the services, applications, and content online. Zero rating limits the possibility for users to distribute content, services, or applications, which removes possibility for innovation, dialogue, or exchange. Under zero rating, users then become a passive consumer of products selected by others. Additionally, some EU countries like France have recognised access to the internet as a fundamental right. It is difficult to imagine how these offers providing access to some but not all the internet, would be in line with this principle if tested in court.

Commercial practices referred to in Article 3(2) can be understood as services or applications that a user would like to buy via a fee in addition to its internet access services. For instance, users could buy a subscription to Premium services, such as a music or video platform, which differ from the services available over the internet. These can be offered as long as they come in addition to internet access services, do not discriminate or otherwise create interference against it, and do not limit users’ choice, as established in recital 7. Further rules rules to ensure the competitiveness of the market and protect users’ rights and choice are laid down in recital 7:

“National regulatory and other competent authorities should be empowered to intervene against agreements or commercial practices which, by reason of their scale, lead to situations where end-users’ choice is materially reduced in practice. To this end, the assessment of agreements and commercial practices should inter alia take into account the respective market positions of those providers of internet access services, and of the providers of content, applications and services, that are involved. National regulatory and other competent authorities should be required, as part of their monitoring and enforcement function, to intervene when agreements or commercial practices would result in the undermining of the essence of the end-users’ rights.”

Those strictly defined commercial practices are different from zero rating as access to the whole internet is maintained at all time, online freedoms are not limited, and the users are the ones choosing to enter into this agreement. While those services can increase users’ choice, zero rating would limit it. To date, we are not aware of evidence indicating that users in the EU would be seeking to give up access to the full internet for only a part of it by entering into zero rating agreements.

• ISP practices limiting end users’ rights?

Article 3 (2) foresees contractual freedom and ISPs’ freedom to conduct commercial practices. Could you provide examples when/under which circumstances commercial practices would limit the rights of end users? (Ref. Article 3(2) and recital 7)

ISPs have the freedom to conduct business as recognised by Article 16 of the EU Charter of Fundamental Rights and can conduct commercial practices foreseen under Article 3(2) of the Regulation.¹¹ This freedom cannot however limit on users’ rights to free expression and freedom of communication as established in recital 7:

“any commercial practices of providers of internet access services, should not limit the exercise of those rights and thus circumvent provisions of this Regulation safeguarding open internet access.”

This rule is in line with Article 16 of the Charter which establishes that the freedom to conduct a business must be in line with the Union law, such as the present Regulation.

• Monitoring of traffic for the purpose of traffic management

What is your understanding or view regarding the monitoring of traffic for the purpose of traffic management (ref. Article 3(3) subpara 2)? What should ISPs be allowed to do in that regard under the TSM regulation?

¹¹ EU Charter of Fundamental Rights, Article 16, 2001.
http://www.europarl.europa.eu/charter/pdf/text_en.pdf

Article 3(3) subparagraph 2 and recital 10 of the Regulation set clear rules regarding the use of data monitoring techniques for traffic management: it is not required. Practices such as deep packet inspection (DPI) create a risk for the right to privacy and are not needed for traffic management purposes. A large number of experts have written on the impact of data monitoring techniques for users' right to privacy. Christopher Parsons argued in 2009 that DPI equipment "should be identified as surveillance technologies that can potentially be incredibly invasive."¹² Parsons determined that when using DPI, ISPs "implicitly 'teach' their customers norms about what are 'inappropriate' data transfer programs, and the appropriate levels of ISP manipulation of customer data traffic." In 2009, Ralf Bendrath and Ben Wagner established a link between the use of deep packet inspection and internet censorship.¹³ The EU Data Protection Supervisor also expressed in 2012 that "risks to privacy, data protection and communication confidentiality are very high due to the high intrusive feature of DPI, which scans the whole content of the IP packets to find out specific patterns against pre-defined criteria established in inspection policies. The impact of these measures is furthermore increased due to the growing convergence of all kinds of communications through the Internet, including those containing sensitive personal data."¹⁴

Finally, any monitoring practices put in place by ISPs must be in line with EU data protection law, currently the Directive 95/46 and Directive 2002/58 as established by Article 3(4) of the Regulation. As provided by the Regulation, only the use of non privacy-intrusive tool to monitor the traffic, but not its content, could be allowed. To that end, we support the guidelines provided by BEREC in the report on monitoring the quality of internet access services in the context of Net Neutrality.¹⁵ Monitoring measures must be transparent to the user and the collection of data must be limited to what is strictly necessary. Further clarification to the use of monitoring techniques for traffic management practices could be provided for the purpose of this guidelines by Article 29 Data Protection Working Party.

¹² Christopher Parsons, Deep Packet Inspection in Perspective: Tracing its lineage and surveillance potentials, 2009.

http://christopher-parsons.com/Academic/WP_Deep_Packet_Inspection_Parsons_Jan_2009.pdf

¹³ Ralf Bendrath, Global technology trends and national regulation: Explaining Variation in the Governance of Deep Packet Inspection, 2009.

http://userpage.fu-berlin.de/~bendrath/ISA09_Paper_Ralf%20Bendrath_DPI.pdf

Ben Wagner, Modifying the Data Stream: Deep Packet Inspection and Internet Censorship, 2009.

<https://advox.globalvoices.org/wp-content/uploads/2009/06/deeppacketinspectionandinternet-censorship2.pdf>

¹⁴ EDPS, Comments on DG CONNECT's public consultation on "specific aspect of transparency, traffic management and switching in an open internet", 2012, p. 3.

https://secure.edps.europa.eu/EDPSWEB/webdav/shared/Documents/Consultation/Comments/2012/12-10-15%20Open_Internet_EN.pdf

¹⁵ BEREC, Report on monitoring the quality of internet access services in the context of net neutrality, 25 September 2014.

berec.europa.eu/eng/document_register/subject_matter/berec/download/0/4602-monitoring-quality-of-internet-access-se_0.pdf

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