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TeliaSonera's response to the Draft BEREC Guidelines on Net Neutrality and Transparency:

Best practices and recommended approaches

TeliaSonera operates fixed and mobile networks in the Nordic and Baltic countries, the emerging markets of Eurasia, including Russia and Turkey, and in Spain. TeliaSonera International Carrier owns and operates more than 43,000 kilometres (~27,000 miles) of fibre network offering voice, mobile, IP and capacity services.

TeliaSonera welcomes the opportunity to comment on the BEREC proposed guidelines on transparency in light of the adoption of the regulatory framework for telecoms. We fully agree that customers should be given all the relevant information when required. Within TeliaSonera "a word class customer experience" has been firmly set as one of three paramount goals for the company. Transparency towards our customers is an important lever and we strive to improve also this part of the customer experience. In this context we would encourage BEREC to aim for a sensible and pragmatic discussion on transparency and we also hope that as an industry we can continue in a more active and constructive dialogue with BEREC.

Actors in the telecommunications and information market continue to innovate to fit the customer needs to a vast array of hardware and online services. TeliaSonera believes that as this market will continue to be increasingly diverse and as services are designed to fit the ever increasing needs of our customers, transparency is a prerequisite for **all** players in the market. It is sometimes the case that the limiting factor on a service is not the network but the online service itself. However, often operators are turned to in these cases as operators have a billing relationship with the customer. We suggest that BEREC should consider what information may be relevant to customers to take this situation into account.

We feel that two key themes need to be kept in mind when designing and implementing any transparency solution; they are **relevance** and **proportionality.** There needs to be a consideration of what information would actually empower the customer to make more informed decisions and what simply would add complexity and confusion; a view we believe that is also shared by BEREC. We are aware also that some customers are more interested in certain elements of traffic management and network characteristics than others. Thought needs to go into what is required to be constantly 'on view' for customers

and what information could be provided on a click through or at further request, in marketing and pre-sales as well as in post-sales.

BEREC points out that it may be useful to make a distinction between problematic and non-problematic traffic management. We would argue that this distinction implies that traffic management is employed to cause disruption and create problems; this is not the objective of traffic management. It would be more useful to allow customers to make a distinction around what they would judge problematic as customers´ views on a certain aspect of traffic management may differ. It is important that transparency information is there to empower the customers, not make decisions for them. We also think that the proposed ideas such as a 'traffic light' system is not the most sensible way to deliver such information; creating negative imagery around products and services would not be helpful for any players in the market. Also placing limitations on the terminology around offers, be it Internet access, data access or web surf for example, may not deliver the desired result, but would add confusion. We think focussing on providing information on the conditions for the access is far more relevant than the name. Having said this, we can see some merit in efforts by professional users to better specify what access and services they need and would like to buy. One example could be in connection with specifications for public procurement by actors in the public sector.

As to comparability, we acknowledge the customer need to compare offers in order to take informed decisions. At the same time differentiation of products will increasingly be an important factor for competitive and attractive offers in the market. We believe that the prime focus should be on *what* information is to be provided to customers, not *how it is* provided. Comparable information needs to be carefully considered so it does not lead to an over simplification or a misrepresentation of a product. This is why we cannot support one standardised approach, based on common parameters and indicators.

The answer to the question of whether the rules should be the same for both wired and wireless or mobile connections is both yes and no. There are inherent physical limitations to the provision of mobile services which mean that customers need to be informed that their levels of connectivity will vary. It would be useful to consider what wording is needed in any Guidelines to represent these limitations most accurately. The fixed wired network is easier to predict and can be seen to more consistently deliver promised speeds and other qualities. We agree that it would be much more customer friendly to advertise an 'expected' speed than a theoretically possible speed, which is why TeliaSonera only markets expected speed. As an example, in Sweden, agreement was reached between mobile operators and the Consumer Ombudsman to market speeds up to x Mbit/s, with an agreed "discount" from the highest theoretical speed. So in that sense it is the "expected" speed. This provides customers with a more realistic representation of the services they purchase.

Information provided on the speed of a connection has emerged as the standard metric used to judge the performance of a network; this has mainly been driven by third party providers of applications or websites which can measure network performance. This is certainly useful information for the customer even though there are many other parameters relevant to provide the full picture of the customer experience. Some examples from the Nordic markets could be mentioned. In Norway, the NRA has established a service called "Nettfart"[1] where the end users can measure the speed on their broadband. In Sweden, there is a similar service "Bredbandskollen" operated by .SE (Stiftelsen för

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[1] http://www.nettfart.no

Internetinfrastruktur)[2]. In Denmark, the NRA has established "Bredbåndsmåleren" for similar purposes. The Norwegian and Swedish NRAs have established services for end users to compare prices for broadband services. Also FICORA in Finland publishes price comparisons for broadband. In Sweden there is also "Konsumenternas tele- TV- & Internetbyrå" that gives guidance for free to consumers on problems and complaints in relation to telecom, TV and Internet subscriptions (on Oct 31, the name was changed to "Telekområdgivarna"[3]).

We believe that all such national arrangements need to be taken into account when considering how transparency best can be achieved in the future. A simple, efficient and transparent national model to ensure the best possible information to customers should be established in each country.

We would like to continue an open dialogue with NRAs and other affected national authorities to define self regulatory initiatives where appropriate and involve consumer groups and the wider telecoms industry in those national markets where we are active.

We remain at the disposal of BEREC, national regulators and other stakeholders to continue a constructive dialogue on this issue.

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[2] http://www.bredbandskollen.se/
[3] http://www.telekomradgivarna.se