



BEREC

Body of European Regulators for Electronic Communication
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Via e-mail: pm@berec.europa.eu

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CONSULTATION: PUBLICATIONS IN THE CONTEXT OF NET NEUTRALITY

Kabel Norge is a trade union for the commercial Cable TV operators in Norway. The union has 25 members located across the country. These operators represent approximately 950.000 Cable TV subscribers, offering TV, broadband and telephony services to 45% of the Norwegian households.

Kabel Norge is a member of Cable Europe, and thus is informed about the views of this organisation, also in regard to the pending public consultation on Net Neutrality and the three publications as outlined in the Press release form BEREC dated May 29, 2012.

Kabel Norge would like to give its support to the opinions expressed by Cable Europe regarding its comments on BEREC's Guidelines for Quality of Service in the scope of Net Neutrality, and on BEREC's report on differentiation practices and related competition issues.

With regard to the latter paper, we would underline that it is not proven that application-agnostic traffic management methods would incur less negative effects for consumer experiences than application-specific methods. The effects would depend on the actual traffic management methods being deployed, taking into account the need to improve the overall functionality of the network.

With regard to the first paper, we would point out that pending the high capacity available in HFC networks, cable operators can meet the requirement of not degrading IAS services whilst at the same time offering capacity for specialized services. In addition, there is no support in the regulatory framework for a similarity in IAS relative speed increase as compared to specialized services.

In particular, Kabel Norge would urge BEREC not to utilize the "Cable TV Internet" name of the scenario B under discussion in the paper. This name is totally misleading and incorrectly supposes that e.g. a predefined selection of content is specific only to cable, which it is obviously not.

In conclusion, Kabel Norge would consider that the NRA's have already the necessary tools to handle any situation related to Net Neutrality issues by virtue of the provisions included in the existing regulatory framework, taking into account that any regulatory interventions should only be made following a thorough analysis of the case in question, closely relating to the overall market situation.

Yours faithfully,

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