

BEREC Statement on the second Broadband Quality of Service report prepared for the European Commission

BEREC welcomes and supports the European Commission's efforts to measure broadband speeds across Europe. Research in this area provides valuable insights into how the broadband markets we regulate are developing, and the impact of these developments on consumers. This makes it all the more important to ensure that the methodology used in measuring broadband speeds is transparent, that the data is accurate and robust, and that the analysis is fair and reliable. This means that:

- **Full transparency is needed about the methodology used in measuring speeds.** It should be clear and unambiguous on the face of the research how the data was collected, and in what way it was processed, including disclosure of confidence intervals. The limited disclosure in the latest report prepared for the EC¹ means it is not possible to assess the extent to which the results are a true and accurate representation of each country's broadband market. Indeed, some countries which have conducted their own speeds measurement have found they do not match the results in the report.
- **The methodology must enable reliable comparisons between countries.** This includes mitigating bias, such as adverse selection, introduced as a result of the non-random sample. The lack of normalisation means that data is not representative and comparisons between countries are therefore potentially misleading and inaccurate. This has not been properly addressed in this report. For instance, no weighting of the results by ISP package market share has been undertaken.
- **The methodology must reflect the fact that EU countries use technologies in different ways.** The definitions used in this report do not recognise this, once again preventing like-for-like comparisons and generating potentially misleading conclusions.

BEREC has shared these concerns with the Commission. While BEREC was not closely involved in developing the measurement methodology for this report, it stands ready to work with the Commission and its consultants to improve the methodology and reporting of results for the third round of this research, expected to be launched later in 2014.

¹ Quality of Broadband Services in the EU, October 2013