



ETNO comments to the BEREC Draft Guidelines for detailing the Quality of Service (QoS) parameters

General remarks

ETNO welcomes this opportunity to provide input to the BEREC updating of the Guidelines for detailing the Quality of Service (QoS) parameters.

ETNO would like to provide its views below on the specific questions BEREC addressed to the stakeholders.

1. Do the existing Guidelines detailing Quality of Service (QoS) parameters assist stakeholders? Are there any challenges to implementing the Guidelines?

Article 104 of the EECC is aimed at ensuring the transparency and comparability of reliable, user-friendly, and up-to-date information for end-users on the quality of internet access and publicly available interpersonal communications services. In order to facilitate comparability across the European Union and to reduce compliance costs, BEREC is empowered to adopt a unified framework in the form of guidelines on relevant measurable quality of service (QoS) parameters and the applicable methodology which NRAs in coordination with other competent authorities should take utmost account of. The European harmonization of QoS parameters for data collection and publication practices should result in substantive benefits, such as enabling comparability among Member States and providing better information on the European electronic communications market, while at the same time promoting the consistent application of regulatory obligations and improving transparency for end-users and public authorities in relation to QoS.

However, in our view, the goals of harmonization and transparency provided by Article 104 of the EECC **are not realized in practice** for the reasons stated below.

Firstly, so far, **there are different practices in countries across the EU as far as the implementation of transparency of QoS is concerned** - some countries, for example, Lithuania, have established extensive and burdensome mandatory requirements in national legislation that are difficult to follow in practice, while in other countries there is no legal framework, and the scope of publicly announced information varies significantly. It should be noted that **when national NRAs establish the mandatory obligations on operators to assess all parameters specified in Article 104 of the EECC (Annex X) according to the methodology provided for in the BEREC guidelines (for example, the principle of measurement (protocols, measurement points), statistical processing, formulas), they do not take into account the potential complexity and additional administrative burden imposed on operators and do not provide for specific measurement conditions** (e.g. how to manage the variety of connection conditions (good, poor

coverage, movement), **time** (distribution over time of hour, day, week, month, year), diversity of technologies) **to ensure comparability**. All major methodology assumptions that should assure result comparability are left for each operator to decide individually. As a result, **variation from country to country is so significant that it requires specific burdensome and costly implementation per country operation creating an incomparable scope of parameters that cannot be used on a daily basis to improve quality and results in no practical value neither for end-user nor operator**.

Secondly, **the relevance and comparability of QoS parameter metrics are key in fulfilling the aim of BEREC guidelines**. Parameter metrics for one end-user are only relevant to the relevant geographical place and per technology (mobile data vs XDSL vs Fiber, etc.) and if the metrics provided are comparable. However, in our view, **this important element is missing in the current guidelines and their application practices**, as further described below.

- For example, we believe that the measurements of the general experience in the network are of **limited relevance** for one end-user within a specific geographical position.
- Some parameters, for example, call signalling delays - CSD/CASD/CRD (Table 1 QoS Parameters as set out in Annex X of the EECC) **have no feasible measurement method** available when traffic cases are produced by several operators and necessary measuring points are not available for on.
- Some parameters, for example, unsuccessful call ratio (Table 1 QoS Parameters as set out in Annex X of the EECC) **do not provide any possibility for the end-user to compare one service provider to another**, i.e. when voice traffic cases are produced by several operators.
- When there are **several measurement methods implemented by service providers**, for example, data transmission speed (upload and download) (Table 2 QoS Parameters not set out in Annex X of the EECC), it **gives significantly different metrics for one parameter**, which makes comparison between service providers almost impossible.
- **One measuring method with one tool**, for example, dropped call ratio (Table 1 QoS Parameters as set out in Annex X of the EECC) **gives different results** pending mobile handset and/or network vendor due to signalling or counters being differently implemented, which makes comparison between service providers almost impossible.
- **Some technical metrics, for example, data transmission speed** (upload and download) (Table 2 QoS Parameters not set out in Annex X of the EECC), **depend on the end-user behaviour** i.e. different data applications require different data transmission speeds (for example, end-user A uses a service that works well with 5 Mbps and will only use 5 Mbps even if 10 Mbps speed is available in the network and end-user B uses a service that works well with 10 Mbps and uses 10 Mbps, in these cases metrics will show end-user A using 5 Mbps and end-user B using 10 Mbps, **which makes it impossible to distinguish which end-user has got the best service quality**.
- Some of the parameters, for example, call signalling delays - CSD/CASD/CRD (Table 1 QoS Parameters as set out in Annex X of the EECC) **are of a highly technical nature and**

require special expert knowledge to be understood therefore, are incomprehensible to the average end-user.

2. Which points in the Guidelines could be more detailed or clarified?

In our view, **detailing and clarification of QoS parameters in an extensive way does not solve any of the challenges to fulfill the aim of harmonization and transparency as provided by Article 104 of the EECC** and to assist service providers, where relevance and comparability are key, as mentioned above.

We believe that **guidelines could rather specify subjective service quality measurements and highlight the need for common NRA measurements** to be officially compatible between service providers in the respective country and between member states.

3. Which parameters, listed, or even not listed, in Annex X of EECC, mostly assist end-users in evaluating the quality of service?

There is a **rather limited scope of parameters** (for example, data transmission speed for internet access service and call set-up failure probability for interpersonal communications services) per service which could assist end-user in distinguishing service quality and the current extensive set of nearly all possible parameters can be minimized, in our view.

4. Do you have any other relevant comment?

We find the **current QoS parameters are tech-centric, lacking relevancy for the larger public and the individual end-user**. This is specifically severe as practice easily turns into comparing technically not equivalent solutions that despite differences can still meet the end-user demands. Thereby there is **a risk of this benchmarking creating unmanageable expectation discrepancy and thereby dissatisfaction amongst the end-users**. Benchmarking of this type negatively impacts larger operators, geographically and technically, vs more technically focused, e.g., fiber only, or geographically/segment-limiting actors of the market.

It is indeed a **complex matter to come to very accurate and comparable statistics**. Perfect comparability is not realistic and could lead to significantly high costs without tangible gain. We believe therefore that **objectivity and comparability of service quality parameters should be achieved in a pragmatic way** and be limited to those parameters that are effectively making sense and are used by the larger public and individual end-users to assess the quality of service (see also above).

For questions and clarifications regarding this position paper, please contact Maarit Palovirta, Senior Director Regulatory Affairs (palovirta@etno.eu) or Xhoana Shehu, Policy Manager (shehu@etno.eu) at ETNO.