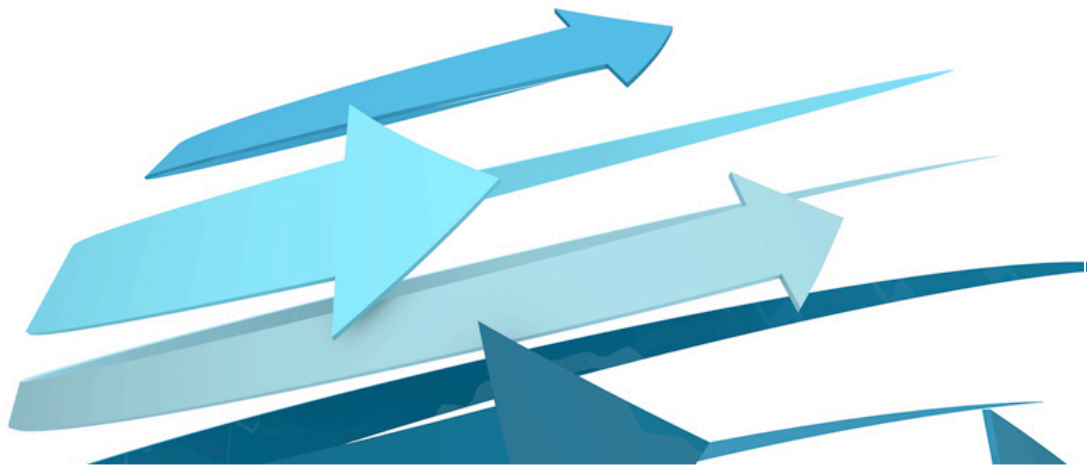




intug | empowering business communications



**Draft Working Programme 2014
BEREC Board of Regulators
INTUG comments**



INTUG comments on the draft BEREC work programme 2014

1. IP-INTERCONNECTION

(5.4)

“The debate on new business models in a convergent IP environment encompasses ongoing debates between stakeholders on charging mechanisms used for IP-interconnection and the distribution of revenues across the value chain between Telcos and OTT. These evolutions in the value chain are more generally important inputs in the NN debate, having implications both at the wholesale and at the retail level.”

INTUG sees new issues for business users when they want to connect via VoIP (SIP trunking) to the operators’ networks. There is an inconsistent approach at different players and countries.

2. CONSUMER EMPOWERMENT AND PROTECTION

(6.1 Net neutrality)

“Both NRAs and end users should be able to monitor the performance of the Internet access service, and of the applications used via that Internet access service.”

This is a crucial point for INTUG, together with the following:

“b. Ecodem – Ecosystem dynamics and demand side forces in net neutrality developments from an end-user perspective

In 2014, BEREC will continue to gather information and empirical data in order to improve our understanding of:

- the various traffic management and strategic responses of ISPs to technical, legal and market constraints
- how consumer expectations and market dynamics are reflected in practice in retail offers“

INTUG presumes that in this context “consumers” include “business users”.

3. INTERNATIONAL ROAMING

(7.1)

On decoupling: INTUG asks not to forget about the business users requirements.

The Threshold Definition and Information Mechanism is still not working for businesses, years after its introduction.

Decoupling: The decision to allow/disallow use of roaming and the selection of the roaming service provider to use rests with the company only and not with the employee using the mobile device. The implementation should fully support this activation and configuration model.

The management and use of the roaming services should be made as straightforward as possible by implementing uniform mechanisms both on operator and on EU country level.

The [INTUG position on decoupling](#).

4. MACHINE-TO-MACHINE

(7.2)

“BEREC will look at this market, mainly to examine if there are any regulatory barriers or other bottlenecks (e.g. with respect to authorisation, numbering etc.) which could potentially hinder its development and analyse competition issues linked to the switching of provider for M2M applications, ...”

INTUG sees that a lot of its members are locked in for M2M-applications for many years as long as the SIM-cards need to be changed physically. INTUG urges BEREC and CEPT to work on SIM-portability or “white” SIM-cards. For M2M-applications number portability is not a request from the business users.

5. INTUG WELCOMES BEREC’S ATTENTION FOR THE BUSINESS MARKET

From the draft work programme:

Emerging challenges in Next-Generation Networks

(5.3)

“Another relevant topic are the features and conditions of Bitstream/VULA products, not least because they are considered as the most relevant wholesale product in case vectoring technology is used. They are also relevant in the context of business grade wholesale products. It will be addressed in a separate workshop at EWG level.”

Initiatives to increase the fluidity of non-residential markets

(7.3)

“Electronic communication services are indeed critical for the day-to-day running of administration and companies.. BEREC has a role to play to foster the dynamic of business markets by organising workshops for NRAs to share their experiences in increasing the fluidity of non-residential markets.”

Comments INTUG

Business today relies on ICT, yet the current regulatory environment does not do everything necessary to encourage adequate competition in the market for ICT services for businesses, nor to support companies and public entities in optimising their potential. Yet the benefits are clear: increased revenue, increased employment and increased innovation, all leading to economic growth and improved social welfare.

INTUG is very pleased to see that the business market for ICT services will be given special and distinct attention by BEREC. European businesses – large and small – want to spend their time and resources on innovation, value creation and improving their competitiveness in world markets, not on puzzling out how to put together an

effective communication strategy using a disparate set of mismatched pieces.

This isn't only relevant for large, international companies. The market of professional users of ICT is diverse.

Some examples for improvement:

Current international mobile service offerings do not meet the needs of multinational companies. The international market remains a fragmented patchwork of national mobile services. As a result, a company can end up with an international mobile framework contract with e.g. 15 individual annexes - one for each European country in which the company has activities. We see a lack of competition, inconsistent tariff structures, fragmented pricing and service models and national units of international operators that are more concerned with their own growth, margins and market share than with providing a comprehensive international service to the customer. Businesses suffer from frustration, inefficiency and high costs.

Last-mile connectivity causes major headaches for organisations of all sizes. While service providers deliver connectivity as closely as possible to the local site, in most cases they must deal with a local service provider, who owns the infrastructure and therefore determines the rules. Local tail is the most costly component of the circuit. Telecom operators must have access to harmonised, business-grade, wholesale last-mile offerings that let them put together the pieces of the puzzle to build a company network.

6. INTERNATIONAL CO-OPERATION

(8.7)

"In 2014 BEREC will continue to pursue its contacts with Regulatory Authorities (such as FCC, KCC etc.), with regional regulatory networks (such as EMERG, Regulatel etc.) and with other international institutions dealing with communications matters (such as OECD and ITU)."

INTUG fully supports these initiatives, as many European businesses are active outside the European borders.

About INTUG

INTUG is a global association of business users of communications. With members and contacts in all five continents, we use this reach to actively promote professional customers interests at the international level and to ensure that the voice of the business user is clearly heard. Our long-term focus is to bring down all barriers companies and public institutions face when developing their ICT strategies. For more info see our web site: www.intug.org

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