Open Letter from Members of the European Internet Exchange Association (Euro-IX)

5 November 2012

CEPT (European Conference of Postal and Telecommunications Administrations
c/o ECO
Peblinghus
Nansensgade 19-3
DK-1366 Copenhagen

Dear Sirs,

In December 2012, the International Telecommunication Regulations (ITRs) will be reviewed at the ITU's (International Telecommunication Union) World Conference on International Telecommunications (WCIT-12). The outcome of the conference is expected to become a new treaty, which will help to define the international regulatory environment for the Internet and telecommunications for many years to come.

Certain proposals for amendments to the 1988 ITRs hint at an intention to consider the Internet as a logical extension to the ITU jurisdiction and, if adopted, may have a negative impact on the success of the Internet. We strongly believe such changes to the ITRs should not be adopted.

We kindly ask for your support to ensure the open, competitive and innovative nature of the Internet in the future, in particular that [1]:

- The ITRs remain a principle-based, high-level, flexible and technology-neutral treaty
- The ITRs principles comply with the EU acquis and policies and do not impose additional obligations upon operators
- The scope of the ITRs remains limited to telecommunications and does not extend to ICT/Internet
- Content issues, data protection and privacy remain outside the remit of the ITRs
- The role of the ITRs with regard to cyber-security and cyber-crime be limited to endeavor the promotion of international cooperation amongst ITU countries
- The ITRs refrain from granting the ITU regulatory powers, or making the ITU a dispute resolution forum
- The ITRs refrain from making ITU recommendations binding
- The ITRs embrace the multi-stakeholders’ mechanism
- The ITRs promote pro-competitive, market-driven principles for telecommunication services
- The ITRs avoid fragmenting the Internet by regulating internet peering, routing, IP address allocation and IP based QoS (Quality of Service)
- The ITRs should not seek to replace the Internet's interconnection model of voluntarily agreed peering and transit with the regulated "call termination settlement” model used in international telephony.

Yours truly,

The undersigned Members of Euro-IX

Cc: Secretariat of Mrs. Neelie Kroes, European Commission

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[1] Source of the list: European Internet Services Provider Association (EuroISPA)

"Ensuring the open, competitive and innovative nature of the Internet in the future"

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