



## **Kabel Norge statement on Commission's consultation on Net Neutrality**

*(October 15, 2012)*

### 1. About Kabel Norge

Kabel Norge is a trade association representing the Norwegian Cable TV operators. These operators are delivering TV and broadband services to about 45 % of the households in Norway.

### 2. General comments

As a trade association, Kabel Norge is not suitably positioned to reply to the Commission's questionnaire, which is highly operationally oriented. Instead, we would like to convey a few views on the main subjects of the consultation. In doing so, we would like to point out that the very large transmission capabilities of HFC (hybrid fibre-coax) cable TV networks is set to become even larger in the future, thanks to new transmission standards being developed.

### 3. Regarding Traffic Management

In our view it is clearly in the interest of consumers that Electronic Communication Providers (ECPs) are able to differentiate their products as much as possible. This will ensure that consumer can choose products according to their needs and demands. In providing that, ECPs should be allowed to apply flexible means of traffic management, aiming at increasing the network efficiency. This approach will also ensure the best possible contribution to the efficiency of the broadband service market as such and its contribution to the overall economy.

Kabel Norge would like to point out that NRAs have already the tools necessary to correct any malfunction in the market by the existing regulatory framework. Therefore, more regulation related to Traffic Management should be avoided, as it could have detrimental effects on the positive results of the approach described above. Likewise, any regulatory intervention regarding minimum quality of service requirements should only come as a last resort and following a thorough analysis of the market situation.

### 4. Regarding transparency and switching

Kabel Norge agrees that transparency is important when ECPs are making their offers to consumers. This will facilitate easy switching without further regulation, based on the strong competition which is already present in the market, and the differentiation of products which is likely to increase even more in the future.

### 5. Regarding IP interconnect issues

In the value chain from content providers through network operators to consumers, Kabel Norge notes that the present situation is not showing a fair distribution of costs. However, we believe that by commercial negotiations between the parties, new charging methods will develop, which will alter the present charging practises. We would like to point out that all links in the value chain should be equally free to develop their own business models without any regulatory interventions.