

Emailed to: netneutrality2021@ofcom.org.uk

2 November 2021

Dear Sir/Madam,

Ofcom: Net Neutrality Call for Evidence.

We welcome the opportunity to comment on Ofcom's Net Neutrality Call for Evidence. We have provided some general comments and our response is relevant to questions 2 and 5.

We welcome the review to look at how the UK's Net Neutrality framework is functioning, which will help inform Ofcom's monitoring and compliance activities. It is generally acknowledged that the internet is becoming an ever more important and essential service. There are new and emerging products and services across a range of sectors that use the internet for different purposes. It makes sense to review what is working well for end users in terms of outcomes and experiences, the impacts of innovation and investment, technology developments, the policy and economic context, as well as looking at topics like terminal equipment, traffic management, the zero-rating approach and the merits of updated guidance.

There are two points we think are worth noting when reviewing how the framework is functioning. Firstly we think it will be important to ensure clarity and guidance on new or amended rules, in particular, for example noting the recent Court of Justice of the European Union ruling on zero-rating which has the potential to impact providers' business models and service offerings in the UK. Secondly, we think it is worth updating and reviewing guidance so that providers and those acting within the sector can share a common interpretation of the net neutrality rules, particularly with the pace of change, new technologies, new ways of using internet services and the potential impact on consumer experience outcomes.

Please do not hesitate to contact us if you would like further information regarding our response. Our response is not confidential.

Your sincerely,



Ed Dodman
Director of Regulatory Affairs

