

Representing:

Self

Organisation (if applicable):

What do you want Ofcom to keep confidential?:

Keep name confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

Yes

Additional comments:

Question 1: How enduring do you think congestion problems are likely to be on different networks and for different players?:

With growth likely to continue on both volume of users and size of media then it is likely that congestion problems will only increase for many years to come. Currently the vast majority of content is streamed in a lower definition but the move to HD 720p and 1080p will see a large increase in traffic.

Question 2: What do you think are possible incentives for potentially unfair discrimination?:

Unfair is a relative term. It is a case of does the needs of the many outweigh the needs of the few or should everyone be treated the same.

My personal opinion is that a negotiated medium is the best option.

Question 3: Can you provide any evidence of economic and or consumer value generated by traffic management? :

There is an economic benefit to ISPs to traffic shape all protocols because bandwidth is expensive to them and the less they have to provision from BT the lower their overheads. However this is to the detriment of the consumer experience. What is more likely is that the ISPs will want to traffic shape the heaviest users which I am not against but there should be a limit on the reduction in bandwidth that ISPs are allowed to make.

Question 4: Conversely, do you think that unconstrained traffic management has the potential for (or is already causing) consumer/citizen harm? Please include any relevant evidence. :

The majority of ISPs will not display their traffic shaping methods on advertising. I believe this to be a very misleading tactic and that it hurts the customer as they can also often be locked into a contract that does not suit their needs.

Question 5: Can you provide any evidence that allowing traffic management has a negative impact on innovation? :

Traffic shaping may impede the uptake of streaming media directly to televisions which is a service I believe netflix already offers.

Question 6: Ofcom's preliminary view is that there is currently insufficient evidence to justify ex ante regulation to prohibit certain forms of traffic management. Are you aware of evidence that supports or contradicts this view? :

There are various forms of traffic management and I believe there should be a legal limit in how much ISPs are allowed to traffic shape.

To use an example the ISP freedom2surf implemented P2P traffic shaping a couple of years ago that saw this type of traffic drop from the 2mbit limit to a 200kbit limit at all peak times, which in their case was from 10am to 10pm or similar. This I believe is too strict and the time and bandwidth limitations should be legally restricted.

For example ISPs should only be allowed to limit to 40% (example value) of the maximum speed of the line so as to provide a fair medium for all users.

I also believe that if there is a download limit in place for a broadband line then it should be limited to a certain speed upon hitting the limit of the line as opposed to large download charges levied.

Question 7: Ofcom's preliminary view is that more should be done to increase consumer transparency around traffic management. Do you think doing so would sufficiently address any potential concerns and why?:

I think this is a very welcome change because traffic management will be used by all ISPs in the near future and traffic management essentially dictates the speed of the line and I put it in the same bracket as 'up to' line speeds which are also often misleading.

Question 8: Are you aware of any evidence that sheds light on peoples? ability to understand and act upon information they are given regarding traffic management?:

I know various family member who are not IT literate and do not understand the concept at all. I see various lines where speeds are measured in MP3s downloadable etc. Adding something which displays how many hours media may be watched or how many TVshows/movies may be downloaded would be helpful to them.

Question 9: How can information on traffic management be presented so that it is accessible and meaningful to consumers, both in understanding any restrictions on their existing offering, and in choosing between rival offerings? Can you give examples of useful approaches to informing consumers about complex issues, including from other sectors?:

Almost all broadband suppliers advertise. It should be required that if they are making positive advertising about there speed then the advert must include the information about what negatively affects their speed. I.e. if they implement traffic shapping.

Question 10: How can compliance with transparency obligations best be verified?:

Question 11: Under what circumstances do you think the imposition of a minimum quality of service would be appropriate and why? :

The largest bandwidth drains are P2P traffic and streaming media. I think shaping of these protocols is a good idea, especially for peak hours, however there should be a limit on the reduction of bandwidth that the ISP can impliment. I don't have statistics on this but I would have though 40-50% limit on bandwidth shapping would be a reasonable compromise.