

## **Body of European Regulators for Electronic Communications (BEREC)**

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## CONSULTATION ON GUIDELINES ON IMPLEMENTATION OF NET NEUTRALITY RULES

The Association of Norwegian Editors (Norsk Redaktørforening - NR) was established in 1950. Among the main topics is to safeguards the professional interests and the editorial independence of its members, to safeguard freedom of expression, the public access to governmental documents, protection of sources, evolving journalistic skills and defending press etichs and selfregulation. We have approximately 720 members, both editors-in-chief and deputy editors from all kinds of news media; print, internet, broadcasting, trade press and magazines.

We are well aware of the remarks made by the Norwegian Media Business Association (NMBA) in their letter of June 28<sup>th</sup>, and we strongly support the main points and arguments in their comments.

We will emphasize the importance of strong and consistent rules on net neutrality, due to the great impact such rules will have on the actual and factual possibilities of executing the freedom of expression such as it is assumed in article 10 in the European Convention on Human Rights.

In extension of these overarching principles, clear and distinct rules on net neutrality – and as few and specific exceptions as possible – could be a very important contribution to the future framework both for the freedom of expression and the freedom and independence of journalistic media. We therefore refer to the remarks made by the NMBA, and urge BEREC to take these in consideration in conjunction with the final work on the net neutrality rules.

Oslo, 2016-07-04

Best regards

Arne Jensen secretary general

Association of Norwegian Editors