



The Internet eXchange Federation
<https://ix-f.net>

Uganda Communications Commission
UCC House
Plot 42 - 44, Spring road, Bugolobi
P.O. Box 7376
Kampala, Uganda

Thursday, July 2nd, 2019

Dear Mr. Mutabazi,

We are writing to in reference to a recent proposal from the Uganda Communications Commission to establish a licensing framework for Internet exchange points (IXPs). The Uganda Internet Exchange Point (UIXP) sent us a copy of this proposal and requested our input.

The Internet eXchange Federation (IX-F) is a transnational organisation that coordinates and supports Internet eXchange Point Associations (IXPAs). Our membership includes the African Internet Exchange Point Association (AFIX), the Asia Pacific Internet Exchange Point Association (APIX), the European Internet Exchange Point Association (Euro-IX), and the Latin America, and Caribbean Internet Exchange Point Association (LAC-IX). Collectively, these IXPs represent over 322 IXPs across 6 continents.

As a federation, we actively work to support the development of effective global policy and regulation related to IXPs. We also work to support the documentation and dissemination of industry best practices. In line with this, we have decided to accept the UIXP's request for input on the proposal and humbly submit the following feedback for your consideration:

1. We strongly support the UCC's policy objectives and much of the proposed framework. The global Internet exchange industry is evolving rapidly, and we believe that effective and measured regulation can help to stimulate the growth of this vital ecosystem.
2. We also support the content of the UIXP's submission which is attached for reference. In general, it aligns with our view of the proposal and our collective knowledge of regulatory best practice.

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3. We strongly support the UIXP's position regarding the proposal to establish a "Designated National Internet Exchange Point" as well as the related requirement for all other IXPs to connect to it. These proposals would technically prohibit competition by excluding fully independent IXPs from the market. In our experience, such policies invariably hinder the growth of the Internet ecosystem wherever they occur and should be avoided.
4. We also agree with the UIXP's position regarding the proposed requirement for all network operators to connect to an IXP. While this may seem like a good way to increase peering, our experience indicates that such policies tend to be ineffective and can even discourage some network operators from entering the market.
5. We also support the general recommendation to convert the proposal's various requirements for pre-approval to an obligation to notify, with a power for the UCC to require remedial action when appropriate. We believe this would afford the UCC equivalent regulatory oversight capabilities while reducing the burden on current and prospective IXP operators, thereby creating a more enabling environment for competition, innovation, and growth.

We hope that the above contributions prove useful in your deliberations. If you have any questions or would like to discuss any aspect of this proposal in more detail, or IXPs in general, please do not hesitate to contact us.

Kind regards,

A handwritten signature in black ink, appearing to read 'Ariel Graizer', is written over a circular stamp that is partially obscured.

Ariel Graizer,
President & CEO,
LAC-IX,

On Behalf of the IX-F Board of Directors