

Mathea Fammels

From: Christian Panigl, UniVie/ACOnet/VIX [Christian.Panigl@Univie.ac.at]
Sent: 28 May 2008 19:19
To: ENISA Economics NIS
Cc: Peter Rastl
Subject: Comment on Report "Security Economics and the Internal Market"

Ladies and Gentlemen,

we are herewith, in our role as provider of the "Vienna Internet eXchange" service (www.vix.at), responding and commenting on the

Report "Security Economics and the Internal Market"

as published under

http://www.enisa.europa.eu/pages/analys_barr_incent_for_nis_20080306.htm

Feel free to publish our response and, please, accept our apologies for not using your Reply Form, as we are in our comment only focussing on Recommendation #12:

12: As for critical national infrastructure, one particular problem is the lack of appropriate incentives to provide resilience in competitive network markets.

We recommend that ENISA sponsor research to better understand the effects of Internet exchange point (IXP) failures. We also recommend they work with telecomms regulators to insist on best practice in IXP peering resilience.

Here is our response:

The **Vienna Internet eXchange** service (www.vix.at) has been provided in the non-commercial, neutral context of the Vienna University Computer Center since 1996 and, in 2001, has been extended in a resilient way to a second location, based on a partnership with Interxion, a carrier-neutral datacenter provider. We are accomodating more than 90 participating ISPs at VIX and are encouraging dual-site connections to our redundant infrastructure. Furthermore, we are explicitly positioning VIX as a complementary infrastructure to improve and optimize regional Internet traffic flows. Participants are required to have established proper global Internet connectivity before they connect to VIX, therefore they aren't solely dependent on a single IXP.

We feel confident that IXPs in general already are perfect means to significantly *reduce* failures in global Internet connectivity, and that the IXP based peering environment - specifically in Europe - is in a perfectly stable and resilient shape and does not require regulation.

VIX has been founding member of the Euro-IX association (www.euro-ix.net) in 2001 and is board member ~~from that time on. Also in this context we are committed to jointly improve the quality and resilience of the European Internet Exchange landscape, together with more than 40 independent IXP operators.~~

Regards,

Peter Rastl

Director of the Vienna University Computer Center

Christian Panigl

"CTO" of the Vienna Internet eXchange