

2010 11 16

To: Mr. Patrick Owens  
Senior Analyst  
Costing and Competitive Services  
Canadian Radio-television and  
Telecommunications Commission  
Ottawa, Ontario  
K1A 0N2

Subject: **Complaint regarding Bell Canada's Internet traffic management practices**

Dear Mr. Owens,

s.19(1)

1. Bell Canada (or the Company) is in receipt of a Commission staff letter dated 27 October 2010, indicating that Commission staff received a complaint regarding Internet traffic management practices (ITMPs) applied by the Company. The complaint by [REDACTED] attached to the Commission staff letter alleges that the Company has "decided to throttle (i.e. lower the bandwidth) on websites beyond only P2P (peer to peer) traffic as stated on the Company's "Network Management" web page." More particularly, Mr. Singh states that downloads from the website [www.hotfile.com](http://www.hotfile.com) are being "throttled" and requests that the Company be required to specify which websites it "throttles" pursuant to its ITMPs. The following constitutes the Company's response.

2. As the Company has consistently stated, it does not intentionally shape any non-P2P file-sharing traffic as part of its network management practices and, as such, there are no websites that the Company "targets" for traffic shaping. However, as the Company has stated in the past, the deployment of any network technology such as technical ITMPs may have some unintended consequences and the Company encourages its customers to bring such unintended consequences to its attention in order to resolve them.<sup>1</sup>

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<sup>1</sup> See Bell Canada(CRTC)15May08-6 CAIP Part VII and The Companies(CRTC)4Dec08-15 PN 2008-19.

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3. As a result of the complaint letter, the Company has performed various tests in an attempt to recreate the reported problem. As accurately indicated in the complaint letter, www.hotfile.com is a storage type of site that leverages http (web) direct downloading mechanisms for the sharing of files. The site offers two types of access, a free access and a premium (paid for subscription) access. Whereas the free access has limitations in terms of the number of concurrent downloads as well as throughput/speed that can be reduced if the site www.hotfile.com is congested, the premium service is not limited in concurrent downloads or throughput/speed as a result of congestion at the site itself.

4. The Company's testing has revealed that in some instances, and for both free and premium hotfile accounts, certain non-P2P www.hotfile.com traffic was indeed being identified by the Company's deep packet inspection (DPI) devices as being P2P file-sharing protocols. Further investigation allowed the Company to determine that www.hotfile.com traffic was being classified by one of the signatures used by the Company's DPI devices as a P2P file-sharing application and as a result traffic from both free and premium accounts were being shaped as P2P file sharing traffic. The Company notes that the inaccurate identification of www.hotfile.com traffic is not the result of any changes to the signatures used by the Company.

5. In order to address the issue of inadvertent shaping of www.hotfile.com traffic, there was a requirement to update the signatures used in the various DPI platforms used by the Company. A solution was implemented for the vast majority of the Company's DPI devices on 2 November 2010 and a second solution for the remaining DPI devices will be implemented by 30 November 2010. As such, www.hotfile.com traffic should no longer be shaped during peak hours after the 30 November 2010.

6. Based on the above, the Company considers that it was and remains in compliance with the ITMP framework established in Telecom Regulatory Policy 2009-657. The Company would like to thank the Commission and [REDACTED] for bringing this issue to the Company's attention and continues to encourage its customers to report any problems in order to allow the Company to investigate and resolve any unintended consequences of its network management practices.

Yours truly,

s.19(1)

[ Original signed by Suzanne Morin ]

**Suzanne Morin**

Assistant General Counsel - Regulatory Law & Policy

c.c.: Lynne Fancy (CRTC)  
[REDACTED]

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