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September 27, 2011

Ms. Joanne Baldassi  
Canadian Radio-television and  
Telecommunications Commission  
Ottawa, ON K1A 0N2

Dear Ms. Baldassi:

**RE: Complaints Regarding Rogers' Internet Traffic Management Practices  
(ITMPs); Your File # 545613**

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Thank you for your letter of September 16th, 2011 regarding the above-noted matter. In your letter, you have asked Rogers to respond to the following:

1. Based on information provided by Rogers' 2 September 2011 letter, as noted above, Commission staff considers that Rogers' ITMPs could potentially continue to misclassify time-sensitive traffic such as other online games and therefore this could be affecting those games. Commission staff considers that Rogers should address and resolve this misclassification problem.
2. Commission staff requests that Rogers file a plan for resolving the possibility of misclassification of other interactive game traffic, by 27 September 2011, that includes specific steps and timelines for each step.
3. Report to the Commission once the problem is resolved, demonstrating that the problem has been fixed. This report should include, at a minimum, the following information:
  - an overview of the solution implemented,
  - an explanation of how the solution resolves the underlying problem,
  - a description of each step taken, and

a description of the changes made to Rogers' ITMP disclosures in order to accurately reflect resolution of this problem.

Rogers is pleased address these issues. In doing so, we believe it would be helpful to provide the Commission with some background on our ITMPs before turning to why, in rare cases, some customers have been impacted when playing certain online games and the measures we have put in place to resolve those issues.

Rogers implements ITMPs to ensure the best experience for all of our customers. Our consumer internet service is designed (and priced) for typical consumer usage patterns such as web browsing, videos, gaming, email, and VOIP. It is also designed with more capacity for downloading than uploading traffic. Our network is not designed for machine to machine uploading of content from a customer's home such as is the case with P2P file sharing uploading.

We manage P2P upload traffic because if we did not, this traffic would grow to occupy the capacity available on our network and so impact our customers' experience. The vast majority of P2P upload traffic is being sourced by non-Rogers customers. Without our traffic management practices, our customers, including online gamers, would experience difficulty uploading traffic. The traffic management we do slows down the upstream delivery of P2P file sharing but does not prevent it. Since P2P file sharing is not as time sensitive as other forms of traffic, we believe managing it has little impact on customer satisfaction.

Our ITMP policy does not target any customer group or content: it is designed to allow us to manage traffic to maximize our customers' overall experience. Online gamers, in particular, need a responsive upstream network. In an effort to provide the best service for all of our customers, Rogers' ITMPs limit only P2P file sharing applications to a maximum of 80kbps of upstream throughput. Our traffic management deploys specialized network appliances to classify traffic and apply our policy where appropriate. The technology and software in use at Rogers is provided by a leading network equipment vendor: Cisco. This is the same technology that is in place in hundreds of other ISPs worldwide, and Rogers does not believe the problems we have experienced are unique to our network.

Most traffic, such as web browsing or email, can be clearly identified by our Cisco equipment with very little chance of error. In very rare situations, traffic that is not P2P file sharing may be misclassified, such as was the case with World of Warcraft (WoW). Rogers has experienced a small number of cases of gaming traffic being misclassified as P2P file sharing traffic. In these cases, gaming customers have only been affected when running P2P file sharing simultaneously with a misclassified game. The typical game requires less than 80 kbps and so would not be affected even if a misclassification were to occur. It is only when the games are running in conjunction

with P2P file sharing that our ITMP would be deployed. This has been confirmed by repeated testing in our lab. We have currently resolved all of these cases.

Based on our testing, we know that some of the complaints that the CRTC has received from gaming customers have blamed unrelated problems on our ITMP. Online gaming problems can be caused by many things unrelated to our ITMP which, however, all cause the same symptoms as misclassification. Unfortunately, customers cannot tell specifically what has caused their problem. It could be, for example, the home pc, the home network, in house wiring, gaming servers, the game itself, Rogers' network and/or external networks. We encourage customers to contact us so we can help to determine the cause of their problem.

We have a plan in place that addresses and responds to issues with online games and other applications. That plan is working well. It is the best solution to the few complaints that we have received, all of which have been resolved.

Our plan is illustrated in the flow chart attached as Appendix 1. It operates as follows:

First, tests are conducted by our vendor Cisco which does extensive quality assurance testing for misclassification by its software on over 800 of the most popular applications, including online games. This testing occurs before Cisco's software is installed in our network.

Second, we perform our own tests before we install the software.

Third, we actively monitor for issues our customers are experiencing including playing online games. If we become aware of a problem with a specific game, we investigate and test it in our own labs. We actively monitor well known blogs and chat groups to determine whether customers are experiencing problems. We also receive information from customer service representatives when they hear from our customers about problems.

Fourth, in the few cases where we have determined there has been a misclassification of an online game, we have used a two-stage solution to fix the problem. In the short term, we whitelist the game manufacturer's servers. Whitelisting means creating a policy that will not apply ITMPs to packets going to and from a game manufacturer's servers no matter how the traffic is classified. This can usually be accomplished in a very short period of time. Whitelisting is effective where the game manufacturer's server can be located. The second stage is a long term solution that involves a software upgrade created by Cisco and deployed on our network that will correct the misclassification. We note that we did not use whitelisting until recently. Using whitelisting allows us to resolve problems much more quickly than was the case with WoW.

Fifth, starting immediately, we will proactively test the top ten most popular online computer games in the Canadian market.

We believe our process is a workable solution to the rare problem of misclassification. It ensures that misclassifications are minimized and dealt with in a reasonable timeframe.

Rogers certainly regrets any problems faced by our online gaming customers. We believe we have put in place a plan that has allowed us to solve these problems. Should any of our customers have problems in the future, we encourage them to contact us so that we can resolve these problems as quickly as possible.

We appreciate the opportunity to respond to the Commission's request.

Yours truly,



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ENCL.

# Rogers' ITMP Complaint Resolution Process

