



October 1, 2018

Kris Anne Monteith  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
Washington, D.C.  
20554

Dear Ms. Monteith:

**Re: Guinness Communications Inc. – FRN: 0016349441 – Transparency Requirements**

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Further to your correspondence of August 29, 2018, Guinness Communications Inc., dba Eastlink (FRN: 0016349441) herein provides information regarding the network management practices, performance characteristics and commercial terms of its broadband Internet access services.

Effective as of October 1, 2018, this is a first-time disclosure for Guinness Communications.

▪ Network Management Practices

- *Blocking.* Any practice (other than reasonable network management elsewhere disclosed) that blocks or otherwise prevents end user access to lawful content, applications, service, or non-harmful devices, including a description of what is blocked.

Eastlink only blocks certain ports on the cable modems that carry known malicious exploits which would otherwise cause harm to our network and/or to consumers.

- *Throttling.* Any practice (other than reasonable network management elsewhere disclosed) that degrades or impairs access to lawful Internet traffic on the basis of content, application, service, user, or use of a non-harmful device, including a description of what is throttled.

N/A - Eastlink does not participate in any throttling of traffic on the cable modem network.

- *Affiliated Prioritization.* Any practice that directly or indirectly favors some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit an affiliate, including identification of the affiliate.

N/A - Eastlink does not traffic shape, prioritize or have resource reservations in place to benefit an Affiliate.

- *Paid Prioritization.* Any practice that directly or indirectly favors some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, in exchange for consideration, monetary or otherwise.

N/A - Eastlink does not practice directly or indirectly in favoring some traffic over other traffic for monetary purposes.

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- *Congestion Management.* Descriptions of congestion management practices, if any. These descriptions should include the types of traffic subject to the practices; the purposes served by the practices; the practices' effects on end users' experience; criteria used in practices, such as indicators of congestion that trigger a practice, including any usage limits triggering the practice, and the typical frequency of congestion; usage limits and the consequences of exceeding them; and references to engineering standards, where appropriate.

Eastlink's internet service does not include usage limits. We use congestion management techniques to make sure our customers have the best possible internet experience and they are applied to all traffic on the network. We monitor congestions throughout the network, including between the internet access switches and the CMTS (cable modem termination system) as well as from the CMTS to the customer. If uses reaches unacceptable thresholds we will perform necessary upgrades to the system. The effect of these practices is to improve customer experience.

- *Application-Specific Behavior.* Whether and why the ISP blocks or rate-controls specific protocols or protocol ports, modifies protocol fields in ways not prescribed by the protocol standard, or otherwise inhibits or favors certain applications or classes of applications.

N/A – Eastlink does not engage in blocking or rate-controlling, nor do we inhibit or favour certain applications or classes of application. This would require use of deep packet inspection appliances, which we do not have in our network.

- *Device Attachment Rules.* Any restrictions on the types of devices and any approval procedures for devices to connect to the network.

Eastlink provides our internet service with Eastlink-approved cable modems, intended to ensure proper performance of the network. As Eastlink provisions the modems, any process for approving modems is an internal exercise. We do not allow cable modems to be purchased outside our system, due to security and quality of service concerns.

- *Security.* Any practices used to ensure end-user security or security of the network, including types of triggering conditions that cause a mechanism to be invoked (but excluding information that could reasonably be used to circumvent network security).

Most Eastlink customers use a cable modem which we call a gateway which has built in firewall / security capabilities. This prevents their devices from being directly connected to the Internet. This is important because it blocks malicious traffic into the customer's home network. Eastlink monitors our network to prevent denial of service attacks on the network and if we discover such activity we are able to stop it.

## - Performance Characteristics

- *Service Description.* A general description of the service, including the service technology, expected and actual access speed and latency, and the suitability of the service for real-time applications.

We provide service via broadband cable modem technology to customers, with services offered at speeds of 20Mbps. This technology allows the customer to access various real-time applications like VoIP, gaming and live streaming of video (skype) which require low latency connectivity. We place speed test servers on our site to allow a customer to verify both their expected service speeds and the latency of their connection. We also ensure the network and customer maintains low latency connectivity by regularly executing congestion management practices. This allows for latency sensitive real-time applications to perform optimally.

- *Impact of Non-Broadband Internet Access Service Data Services.* If applicable, what non-broadband Internet access service data services, if any, are offered to end users, and whether and how any non-broadband Internet access service data services may affect the last-mile capacity available for, and the performance of, broadband Internet access service.

N/A

- Commercial Terms

- *Price.* For example, monthly prices, usage-based fees, and fees for early termination or additional network services.

Residential: 20Mbps service; \$63.14. No usage based billing, no early termination or additional network services.

Commercial: \$48.07/mth– Dynamic 20. \$55.59/mth for Static 20 with each IP address at \$15.03/mth.

- *Privacy Policies.* A complete and accurate disclosure about the ISP's privacy practices, if any. For example, whether any network management practices entail inspection of network traffic, and whether traffic is stored, provided to third parties, or used by the ISP for non-network management purposes.

Eastlink has no network management practices that involve inspecting network traffic or providing it to third parties.

- *Redress Options.* Practices for resolving complaints and questions from consumers, entrepreneurs, and other small businesses.

Eastlink provides service in the Point Roberts community, a very small community serving fewer than 1,000 customers (a number of whom are seasonal). At Eastlink, because we also serve customers outside the US, we have a large customer care center, and we operate a customer-focused business, which ensures we are available and responsive to all customers in cases where they have complaints or concerns regarding their service. All customers in our Point Roberts system, receive direct attention in response to any concerns, and we have a process to escalate complaints where they are not resolved at first instance by our customer care representative.

Executed on: October 1, 2018



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Natalie MacDonald  
VP Regulatory