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March 14, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Petition for Rulemaking to Establish Rules Governing Network Management Practices by Broadband Network Operators; Petition for Declaratory Ruling Regarding Internet Management Policies; Broadband Industry Practices, WC Docket No. 07-52**

Dear Ms. Dortch:

On March 14, 2008, I sent, via e-mail, the attached Verizon press release to Ian Dillner, John Hunter, Scott Bergmann, Scott Deutchman, Chris Moore, and Catherine Bohigian.

Respectfully submitted,

Attachment

NEWS RELEASE

FOR IMMEDIATE RELEASE
March 14, 2008

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Test Signals Breakthrough to Speed Transfers of Large Files Over the Internet

Peer-to-Peer Experiment Using Verizon's Broadband Network and Pando Networks Service Slashes Delivery Times, Relieves Network Traffic

NEW YORK – Large files can be moved over the Internet more quickly and efficiently using a new peer-to-peer (P2P) file transfer system, recent tests over the Verizon network show. The new P2P protocol guides the selection of file sources and network pathways rather than letting the selection happen randomly, or using criteria that don't maximize efficiency.

P2P file transfers using distribution software that links content owners to authorized users is increasing, with companies like TV networks, movie distributors and software firms taking advantage of P2P as a low-cost distribution option.

When deployed, the new system will move material authorized by the content owners -- such as movies, TV programs, software or large data bases -- faster for consumers and more efficiently for network operators. The new system and tests were described in a presentation Friday (March 14) in New York by Douglas Pasko, Verizon senior technologist and co-chair of

the P4P Working Group, and co-chair Laird Popkin of Pando Networks. The group is sponsored the Distributed Computing Industry Association (DCIA). Yale University software experts worked on and monitored the project. Companies like Pando Networks and others provide content-sharing companies and customers with secure programs for their exchanges.

The new system addresses a growing challenge to Internet service providers (ISPs) and network carriers as P2P networking becomes more and more common. Because many files transferred today using P2P are so massive, P2P sharing can account for well beyond half of total Internet traffic, according to industry estimates.

No longer the dark-alley distribution system for unauthorized file sharing, advanced P2P delivery networks link content-seekers with licensed files they want and that are stored by other subscribed users rather than on servers maintained by content owners or ISPs. P2P is being mainstreamed by distributors like NBC Universal, which is beginning to distribute its NBC Direct programming by leveraging P2P technology and software provided by Pando Networks, rather than the traditional client-server approach.

"The results of the testing have been phenomenal," said Pasko. "Customer and network benefits were seen as soon as the test began. This new system, which routes files along the fastest, least expensive path, offers our FiOS customers P2P downloads up to six times faster than networks without the overlay, the study showed. On average, download speeds using other Internet access technologies improve by about 60 percent."

According to Pasko, the end result of the experiment and ultimate implementation could be "carrier-grade P2P," once focused routing and handling replace arbitrary delivery paths. The system could cut P2P network delivery costs for participating network companies by as much as 50 percent.

"We are thrilled with these results and look forward to helping Verizon and other ISPs deploy the technology more broadly," said Popkin, who is chief technology officer of Pando Networks.

The working group was set up within the DCIA to engage more industry players in the test and to share the results throughout the industry. The ultimate impact will be to relieve pressure on networks so that phone companies, cable companies, ISPs and content owners can limit or avoid system clogging of file delivery pathways.

"It is becoming abundantly clear that P2P networking has enormous potential," said Marty Lafferty, the CEO of DCIA. "It will likely be the next networking wave in a consumer-led drive for more video and other content that will soon include massive high-definition (HD) files, complex multimedia offerings, and a greater number and selection of the traditional content downloads that support consumers, businesses, and government. It is up to the industry to ensure that the P2P services work for everyone and live up to the demands users of all kinds put on them."

Pando's Popkin said, "The collaboration of various network and sharing companies through this effort indicates great promise for this distribution model because the more networkers who deploy it, the more the benefit accrues to the networks and the customers. There are more than 50 organizations engaged in the working group, and that kind of curiosity and engagement shows how aware the industry is of the need for efficiency and speed in P2P delivery."

Today, using host server technology, most files are requested from servers owned by content owners or ISPs. The customer requests a file and it is downloaded directly to the customer. With P2P, the file delivery leverages user computers or other places where the files

are stored and then draws the files -- or parts of them, simultaneously -- from the other users' computers to the requesting one.

Traditionally, the P2P network has randomly selected where the file came from, ignorant of the physical location of the data and sometimes using a "brute force" approach to compensate for long-distance delivery delays. With the experimental software, developed by Yale University and Pando Networks, and using network data provided by Verizon, the network selects the sources that provide the least cost and fastest route for the delivery of the file to Verizon customers.

"It makes no sense for a customer to arbitrarily download a file from Singapore, consuming bandwidth on high-cost, high-traffic routes like Pacific undersea cables, when the file is stored right down the street and can be accessed more quickly and cheaply," Pasko said.

In a report to the DCIA on the trial, Pasko, Popkin and Haiyong Xie, a researcher from Yale University where the software design was created, said that the field test has clearly validated the value of P2P networks and ISPs working together to provide the most efficient, highest-quality service to their customers.

According to Pasko and Popkin, this live, active network role is fundamental to an ultimate solution for P2P traffic-management that eventually would likely involve additional, complementary tools such as caching, and content acceleration, among others**.** Getting networks engaged in the solution is critical, they said.

"This is a great example of an industry getting together and developing a solution to an industry problem," Pasko said.

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