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April 9, 2008

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: In the Matter of Broadband Industry Practices, WC Docket No. 07-52;  
*Ex Parte Communication***

Dear Ms. Dortch:

The attached press release, which has been shared with the Commissioners, provides further proof that policymakers have been right to rely on marketplace forces, rather than government regulation, to govern the evolution of Internet services. The collaboration with Pando Networks, Co-Chair of the P4P Working Group, reflects Comcast's commitment to a continuing dialogue with other participants in the Internet marketplace to ensure that all of us can continue to deliver ever-improving services to consumers.

If you have any questions, please feel free to call me.

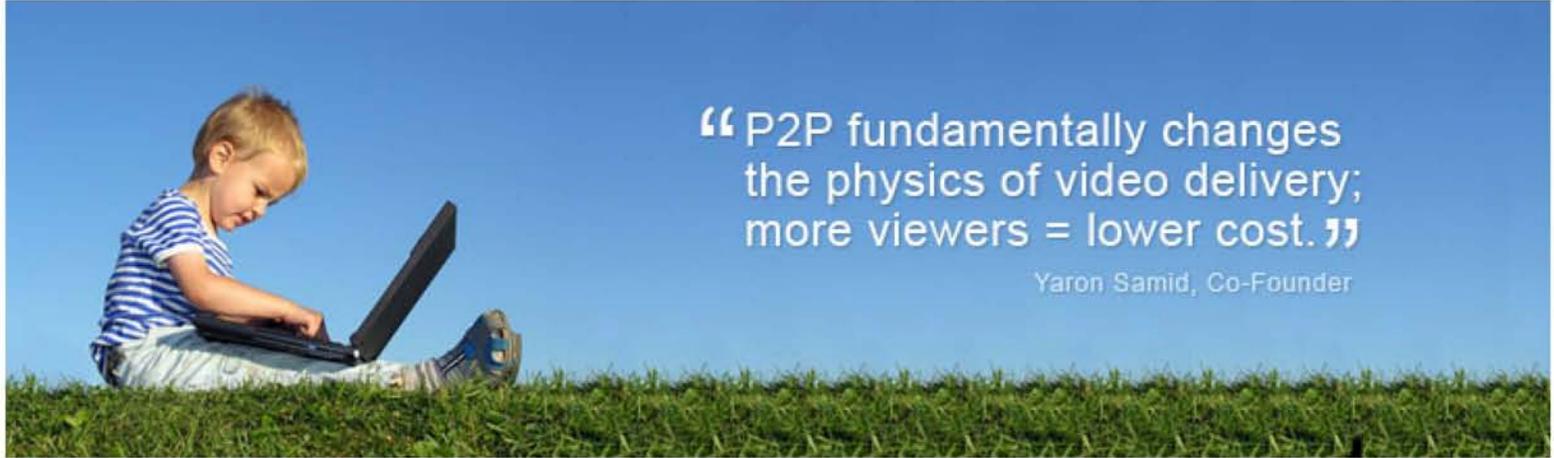
Sincerely,

*/s/ Kathryn A. Zachem*  
Kathryn A. Zachem  
Vice President, Federal Regulatory  
Comcast Corporation

cc: Mr. Scott Bergmann  
Mr. Scott M. Deutchman  
Mr. Ian Dillner  
Mr. John W. Hunter  
Mr. Chris Moore



54,244,349 Gigabytes Delivered



“P2P fundamentally changes the physics of video delivery; more viewers = lower cost.”

Yaron Samid, Co-Founder

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## Pando Networks Releases Results of Global P4P Field Test to Improve Peer-to-Peer Performance in Broadband Networks

April 11, 2008

### Increased delivery speeds and lower network costs achieved worldwide

NEW YORK – April 9, 2008 – Pando Networks, the leading provider of managed P2P content delivery services today made public more details of the recent P4P field test, demonstrating how advanced peer-to-peer (P2P) protocols can increase delivery speeds for consumers, while reducing network delivery costs for Internet service providers (ISPs). The new details revealed by Pando Networks demonstrate significant benefits for national and international broadband networks using multiple technologies including cable, DSL, and fiber.

The results show increased delivery speeds by up to 235% across US cable networks and up to 898% across international broadband networks. The results also show Pando's ability to use P4P and Pando Network Aware™ technology to route data internally across the broadband networks instead of pulling data from external sources that put more strain on the networks. For example, across US cable carriers, Pando increased the percentage of data routed internally across their networks from 2.2% to 43.4% of all downloads. This optimization reduced inter-ISP data transfers by an average of 34% (up to 43.8 % in the US and 75.1% internationally) demonstrating that network awareness provides significant network efficiencies for all ISPs.

Initial results of this field test, reflecting data exclusively for the US-based Verizon broadband network, were presented March 14th in New York at the Distributed Computing Industry Association (DCIA) P2P MARKET CONFERENCE by Co-Chairs of the P4P Working Group (P4PWG) Laird

Popkin (Chief Technology Officer of Pando Networks) and Douglas Pasko (Verizon Senior Technologist). The details released today represent the complete test that was conducted globally and features data collected from more than 3,000 ISPs worldwide.

The technology used in this first P4P field test was developed by engineers at Pando Networks based on research from Yale University. The protocols and specifications are being shared within the P4PWG, which is open to all ISPs and P2P technology providers, and sponsored by the DCIA.

The impact of this new system is wide ranging. It makes the Internet a more scalable media distribution platform while benefiting various online media constituencies. It helps ISPs reduce network operating expenditures as well as enable content owners to distribute longer form, higher quality content.

DCIA CEO Marty Lafferty said, "The global results achieved by Pando Networks in this initial P4P field test exceeded our expectations coming out of preliminary simulation studies. In particular, the fact that P4P demonstrated enormous benefits worldwide for cable as well as telco-based ISPs, and for small as well as large network operators, augurs extremely well for profitable mutually beneficial collaboration."

"We are certainly thrilled with the results from our global test. Pando is now ready to help ISPs deploy 'carrier-grade' P2P technologies," said Popkin.

As part of the test that began February 21st, Pando Networks delivered video content to more than 1 million people across global broadband networks including AT&T, Bell Canada, Bezeq International, BT, Cablevision, Comcast, Cox, Orange, Sasktel, Telefonica, Telecom Italia, Time Warner, Tiscali, and Verizon. Pando used ISP-supplied topological data for some of the networks, such as Verizon and Telefonica, while using proprietary Pando Network Aware™ technology to deliver content across other networks such as Comcast and AT&T.

Commenting on the release of the results, executives from industry leading ISPs indicated support for the initiative and a willingness to participate in more testing.

"Having been involved in the P4P Working Group since its outset, we are very pleased that the initial field tests have validated the extensive simulation studies conducted prior to this important step. We're interested in approaches to content delivery that are good for users, content providers and network providers. These trials are a first step in that direction," said Charles Kalmanek, Vice President – Internet and Network Systems Research, AT&T Labs.

"These newly released test results demonstrate the applicability of P4P to cable ISP infrastructures. The initial results are promising and we look forward to continuing our mutual efforts with P2P companies distributing legitimate content in order to improve the efficiency of their applications on our network," said Tony Werner, Comcast Cable's Chief Technology Officer.

"We are particularly pleased with the positive indication of these expanded test results for international ISPs with multiple diverse broadband operations in multiple territories, given our unique requirements for balancing internal and external traffic loading to optimize user quality of service (QoS) and infrastructure usage," said Emilio Sepulveda, Senior Manager Strategy & Business Innovation, Telefonica International Wholesale Services.

The results of the testing have been phenomenal," said Pasko of Verizon. "Customer and network benefits to our large US-based telco broadband network were seen as soon as the test began."

"These results signal a historic turning point in the history of P2P" added Robert Levitan, CEO of Pando Networks. "Finally, ISPs and P2P

technology providers can work collaboratively. Our goal is an important one: scale the Internet into a better media distribution platform that addresses the needs of ISPs, content owners and consumers.”

About Pando Networks Inc. Pando Networks is the leading provider of managed P2P content delivery services. Pando technology combines the reliability and control of CDNs with the scale and cost efficiencies of P2P protocols. Pando co-chairs with Verizon the P4P Working Group that is developing methods to enable ISPs and P2P service providers to route data more efficiently. Pando is funded by Intel Capital, BRM Capital and Wheatley Partners. Pando has received numerous industry awards including: AlwaysOn 100 Top Private Company, TechCrunch Connected Innovator, C/net Webware 100 and Web Video Summit 2007 Hottest Products of the Year. For more information, please visit [www.PandoNetworks.com](http://www.PandoNetworks.com).

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