

FIRST RESPONSE TO ICTA's CONSULTATION

ON

**'A POLICY FOR DEEP PACKET INSPECTION AND SIMILAR
TECHNOLOGIES'**

(Ref: CD 2009-4)

July 28, 2009

By e-mail to: consultations@icta.ky

August 28, 2009

LIME

INTRODUCTION

Cable and Wireless (Cayman Islands) Limited, trading as LIME (“**LIME**”) is pleased to provide the following submissions in response to the Authority’s 28 July 2009 “Public Consultation on A Policy for Deep packet Inspection and Similar Technologies” (“**CD 2009-4**”), as amended by the Authority’s 13 August 2009 letter. Deep Packet Inspection (“**DPI**”) is the foremost technology today for identifying and authenticating protocols and applications conveyed by IP across the network of an Internet Service Provider (“**ISP**”). DPI also provides real time analysis of IP network usage and consequently allows ISPs to optimize network performance in real time.¹ However, as identified by the Authority in CD 2009-4, “DPI” can mean many different things to different people, and the Authority and the public should be careful not to lose the benefits of DPI out of fear of potential abuses.

AUTHORITY QUESTIONS FOR SERVICE PROVIDERS

The Authority asked a number of questions at paragraph 25 of CD 2009-4 specifically for service providers. As directed in the Authority’s 13 August 2009 letter, LIME responds to those questions below. LIME will answer the Authority’s other questions, and address the policy issues relating to DPI generally, in its subsequent submission on 28 September 2009.

Question A

Do you currently employ, or do you plan to employ, DPI or similar technologies on your networks?

LIME’s Response

LIME does not currently employ DPI technologies on its networks in the Cayman Islands. LIME had formulated plans to employ DPI on its Internet network, for the

¹ Pg. 1, <https://www.dpacket.org/articles/deep-packet-inspection-2009-market-forecast>
Pgs. 1, 2, <https://www.dpacket.org/articles/digging-deeper-deep-packet-inspection-dpi>

traffic management and service-related purposes noted below, but these plans will be deferred until such time as the Authority makes a determination in this proceeding and lifts its 10 July 2009 directive.

Question B

If the answer to (a) is yes, describe in detail the use you make, or plan to make, of these technologies.

LIME's Response

LIME plans included making the following use of the technology:

1. Enforcement of agreement with customers for the delivery of download speeds and usage.
2. Better understanding of the IP traffic profile of our Internet backbone.
3. More effective routing of traffic on LIME's Internet network.
4. Assistance in the development of customized services and billing.
5. Protecting the network and the service quality offered from exposure to security threats.

Question C

Do you currently employ traffic management technology or techniques, other than DPI, such as traffic shaping or traffic throttling, that result in the control of a customer's bandwidth?

LIME's Response

Yes

Question D

If the answer to (a) or (c) is yes, describe in detail your Internet Traffic Management Policies.

LIME's Response

LIME currently applies only one "Internet Traffic Management Policy", as defined by the Authority: a customer's bandwidth is restricted to the bandwidth of the package that the customer pays for, irrespective of the bandwidth available on the physical connection to the customer. For example, a customer may have an ADSL link that would permit 1MB bandwidth, but has only purchased a 256KB package. In this situation, the bandwidth capacity would be restricted to 256KB.

LIME also employs selective routing on its Internet links to ensure DIA traffic is always routed on the faster Internet links. This ensures that DIA customers will be the last to experience delays should a link or several links become congested or unavailable. However, it is not clear whether the Authority would consider this routing policy an "Internet Traffic Management Policy" as defined above.

There are no other current forms of traffic policy applied.

As noted above, LIME will respond to the questions at paragraphs 25 (e) to (g) of CD 2009-4 by September 28, 2009 in accordance with the August 13, 2009 determination of the Authority.

CLOSING REMARKS

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