

PELLA FIBER CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) SUMMARY

Customer Proprietary Network Information (CPNI) is information that telecommunications carriers have available to them because of the relationships they have with their customers. The Telecommunications Act requires telecommunications carriers to protect the confidentiality of this proprietary information and the FCC has adopted rules to ensure that carriers are protecting CPNI.

- **What is CPNI?** Telecommunications information that is maintained in the customer's service record/account that is personal to the customer. Some examples of CPNI are; to whom, where and when a customer places a call; length of and toll amount of a call; service offerings; calling features; technical configurations to which the customer subscribes.
- **What is not CPNI?** Subscriber list information – name, address and telephone number, information from non-telecommunications services, e.g., Internet or Cable TV or aggregate information (collective data that relates to a group or category of services or customers, from which individual customer identities and characteristics have been removed).
- **What are the customer authentication requirements for CPNI?** The FCC requires a company to verify that **all** customers who come into the office and that **all** customers who call the office are who they say they are, and that they are listed as a contact on the account. **A company cannot discuss an account with anyone that has not been authenticated or that is not authorized as a contact person for the account.**
- **How does a company authenticate the customer?**

In-office visit – the customer must show a valid photo ID and be listed on the account.

Customer-initiated call regarding:

- Non-call detail information, which is products, type of services customer subscribes to, technical configuration, amount customer owes, etc.
 - The CPNI rules allow the company to determine the authentication method that is appropriate for this type of information. It could be a pre-established answer to a question or something about the account.
- Call Detail Information pertains to specific telephone calls, both inbound and outbound, such as, from or to number, time, location, duration of call, amount of call, etc.
 - The CPNI rules require that to discuss this on a customer-initiated call the customer must provide a "valid" password that is not based on readily available biographical information or account information.
 - Are there any exceptions to discussing call detail information without a valid password? Yes, if the customer can provide the details (for example, telephone number called, time and place, amount, etc.) of the call, the company can discuss the customer's questions regarding call detail information. This is considered routine customer care procedures. But, remember the customer must still be authenticated in some way.
 - What if the customer cannot provide the details and they cannot provide or have not established a valid password? The Company can call the telephone number of record, send the call detail to the address of record or have the customer come into the office and provide a valid photo ID.

- **What needs to be done when a customer changes the address on the account?** The customer must be sent a notification to the “old” address notifying the customer that a change has been made to the account.
- **What other changes require a notification to be sent to the customer?** A change to a customer response to an authentication question or to an online account authentication or password.
- **Once the customer has been authenticated, is it okay then to use the customer’s CPNI for all purposes?** No, there are rules for using CPNI for marketing purposes. A company must have customer approval to use CPNI to market a service *outside the customer’s existing service relationship*.
- **How does a company get approval to use CPNI for marketing purposes outside the customer’s existing service relationship?** A company can ask for approval to use their CPNI using the opt-out method or opt-in method.
- **Is a company required to ask customers for permission to use their CPNI?** Only if the company is going to use CPNI for marketing services outside the customer’s existing service relationship. If a company does mass marketing to all customers, which does not use any CPNI, then the company is not required to ask for permission.
- **Can CPNI ever be used without the customer’s approval?** Yes, see below:
 - To discuss customer’s existing services.
 - To answer any questions the customer has about any charges on his/her bill.
 - To provision or market inside wire installation, maintenance or repair service.
 - To provision customer premise equipment (CPE) and voice mail.
 - To market improvements, enhancements or additional services among the category of telecommunications services to which the customer already subscribes. For example, if a customer subscribes to a company’s local and long-distance services, you can market custom calling features, call monitoring, call blocking, toll plans, etc.
- **Can a company disclose CPNI to third parties?** Only if it has received express permission from the customer to share its CPNI with a third party.
- **What is a breach?** A breach has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI with intent to do harm.
- **What happens if CPNI is used inappropriately?** A company must have a disciplinary process in place for unauthorized use of CPNI. Also, depending on what the breach is, it may need to be reported to the United States Secret Service and FBI.