

## **STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION**

In accordance with Section 222 of the Communications Act and the Federal Communications Commission's ("FCC") CPNI Rules (47 C.F.R. § 64.2001, et seq.), Grasshopper Group, LLC ("Grasshopper") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

Grasshopper provides telecommunications services to retail customers. Because Grasshopper may access, use, or store CPNI when providing these types of services, the Company undertakes the steps outlined in this Statement of Policy to protect CPNI from unauthorized access or misuse.

### **Definition of CPNI**

Under federal law, CPNI is certain customer information obtained by a telecommunications provider during the course of providing telecommunications services (including interconnected VoIP) to a customer. This includes information relating to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier.

Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

### **Use of CPNI**

It is the policy of Grasshopper not to use CPNI for any activity other than as permitted by applicable law. Any disclosure of CPNI to other parties (such as affiliates, vendors and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by Grasshopper to the customer. Except in instances where Grasshopper is required by law to disclose CPNI, such as through subpoenas or other requests by law enforcement officials, or if the intended use is permitted by FCC Rules, Grasshopper will first obtain the customer's consent prior to using or sharing CPNI.

### **Disclosure of CPNI**

Grasshopper prohibits the release of CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances.

- When the customer has pre-established a password;
- When the information requested by the customer is to be sent to the customer's address of record; or
- When Grasshopper calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.

### **Online Access to CPNI**

If Grasshopper grants online access to CPNI, the Company authenticates a customer without the use of

status of a customer's CPNI approval. The following sets forth the procedure that will be followed by the Company:

- Prior to any solicitation for customer approval, Grasshopper will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- Grasshopper will use opt-in approval for any instance in which Company must obtain customer approval prior to using, disclosing or permitting access to CPNI.
- A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
- Records of approvals are maintained for at least one year.
- Grasshopper provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
- The CPNI notices sent by Grasshopper comply with FCC Rule 64.2008(c).

Grasshopper will also establish a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one (1) year.

### **FCC Notification**

The Company is prepared to provide written notice within five (5) business days to the FCC of any instance where the opt-in mechanisms do not work properly or to such a degree that consumers' inability to opt-in is more than an anomaly.

### **Third Party Use of CPNI**

To safeguard CPNI, prior to allowing joint venturers or independent contractors access to customers' individually identifiable CPNI, Grasshopper will require all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy. Grasshopper shall also obtain opt-in consent from a customer prior to disclosing the information to such third parties for marketing purposes. In addition, Grasshopper requires all outside agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

Grasshopper requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.

Grasshopper does not market or sell CPNI information to any third party.

### **Law Enforcement Notification of Unauthorized Disclosure**

If an unauthorized disclosure of CPNI occurs, Grasshopper shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").

Grasshopper shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.

Notwithstanding the above, Grasshopper shall not wait the additional seven (7) days to notify its customers if the Company determines there is an immediate risk of irreparable harm to the customers.

Grasshopper shall maintain records of discovered breaches for a period of at least two (2) years.

## **Grasshopper Group, LLC**

### **Annual CPNI Certification 47 C.F.R. § 64.2009(e) EB Docket No. 06-36**

COMPANY NAME: Grasshopper Group, LLC

REPORTING PERIOD: January 1, 2017 - December 31, 2017

FILER ID: 827977

OFFICER: Chris Bohlin

TITLE: Vice President

I, Chris Bohlin, hereby certify that I am an officer of Grasshopper Group, LLC ("Grasshopper") and that I am authorized to make this certification on behalf of Grasshopper. I have personal knowledge that Grasshopper has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Grasshopper or to any of the information obtained by Grasshopper. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Grasshopper employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Grasshopper or to the information obtained by Grasshopper.

Signed: Chris Bohlin

On behalf of Grasshopper Group, LLC

Date: 02/23/18