

# **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.), Vodafone US Inc. ("Vodafone US") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

Vodafone US provides telecommunications services to retail customers. Because Vodafone US 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 Vodafone US 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 Vodafone US to the customer. Except in instances where Vodafone US 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, Vodafone US will first obtain the customer's consent prior to using or sharing CPNI.

## **Wholesale Services**

With regards to wholesale services, Vodafone US typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service. Nevertheless, the company will follow all CPNI policies outlined within the Statement of Policy, to the extent applicable to its wholesale services.

## **Disclosure of CPNI**

Vodafone US 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 Vodafone US 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 Vodafone US grants online access to CPNI, the Company authenticates a customer without the use of readily available biographical or account information prior to allowing the customer online access to CPNI stored online. Once authenticated, the customer may only obtain online access to CPNI through a password that is not prompted by the carrier asking for readily available biographical or account information.

## **Password Authentication Procedures**

To establish a password, Vodafone US authenticates the identity of the customer without the use of readily available biographical or account information. The Company may create a back-up customer identification method in the event a customer misplaces or forgets a password, but such alternative customer authentication will not depend on readily available biographical or account information. If a customer cannot provide the correct password or the correct response for the back-up customer authentication method, the customer must establish a new password.

## **Account Change Notification**

Vodafone US notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

## **Disclosure to Business Customers**

Vodafone US may negotiate alternative authentication procedures for services that the Company provides to business customers that have a dedicated account representative and a contract that specifically addresses the protection of CPNI.

## **Employee Training Policies and Disciplinary Procedures**

All employees of Vodafone US are trained as to when they are, and are not, authorized to use CPNI. Through this training, Vodafone US has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from a supervisor, and the extent to which the violation was or was not deliberate or malicious).

## **Use of CPNI in Sales and Marketing Campaigns**

If Vodafone US uses CPNI in marketing campaigns, the company will maintain a record of all sales and

marketing campaigns that use the CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

Vodafone US will also implement a system to obtain prior approval and informed consent from its customers in accordance with the CPNI Rules. This system will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

Prior to commencement of a sales or marketing campaign that utilizes CPNI, Vodafone US will establish the 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, Vodafone US will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- Vodafone US 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.
- Vodafone US provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
- The CPNI notices sent by Vodafone US comply with FCC Rule 64.2008(c).

Vodafone US 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, Vodafone US will require all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy. Vodafone US shall also obtain opt-in consent from a customer prior to disclosing the information to such third parties for marketing purposes. In addition, Vodafone US requires all outside agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

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

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

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

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

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

Notwithstanding the above, Vodafone US 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.

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

## **Customer Complaints**

Vodafone US has not received any customer complaints in the past year concerning the unauthorized release of or access to CPNI.

## **Contact Information**

Individuals or entities that have questions about this CPNI Certification or the use of CPNI by Vodafone US may contact the company's legal counsel, Blair Rosenthal, at (720) 484-0554 or [blair.rosenthal@vodafone.com](mailto:blair.rosenthal@vodafone.com).

## **Actions taken against Pretexters**

Vodafone US has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC in the past year. Vodafone US has no information, other than information that has been publicly reported, regarding the processes that pretexters are using to attempt to access CPNI.

## **Annual CPNI Certification**

Pursuant to FCC regulations, 47 C.F.R. § 64.20089(e), Vodafone US will annually submit to the FCC, prior to March 1st, a CPNI Certification of Compliance and accompanying Statement regarding the company's CPNI policies and operating procedures. These documents certify that Vodafone US complied with federal laws and FCC regulations regarding the protection of CPNI throughout the prior calendar year.

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

COMPANY NAME: Vodafone US Inc.

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

FILER ID: 830549

OFFICER: Bryan Ganno

TITLE: Assistant Treasurer

I, Bryan Ganno, hereby certify that I am an officer of Vodafone US Inc. ("Vodafone US") and that I am authorized to make this certification on behalf of Vodafone US. I have personal knowledge that Vodafone US 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 Vodafone US or to any of the information obtained by Vodafone US. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Vodafone US 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 Vodafone US or to the information obtained by Vodafone US.



Signed:

On behalf of Vodafone US Inc.

Date: February 12, 2018