### SYSTEMS FAILURE - BOSS/CARS

In the event that BOSS/CARS is down and the sales office elects to use an unprotected system (i.e. LMOS) in order to continue to serve the customer, you may only discuss enhanced services or CPE if the **customer initiates** the discussion. You may talk about enhanced services/CPE features, discuss rates, and respond to specific questions the customer asks. For an **enhanced services** sale you **MAY NOT** close the sale and place an order for the service until we are able to access his/her account. You may make a commitment to call the customer to discuss enhanced services/CPE when BOSS/CARS is up again. Once BOSS/CARS has been restored, enhanced services/CPE may again be sold.

## COMPLIANCE WITH SECURITY PROCEDURES

It is critical that you comply with the rules for password security. If, as an enhanced services/CPE salesperson, you are blocked from access to a customer account or CFN number, you **MAY NOT** attempt to retrieve that account from another source. This includes viewing records on:

- Unsecured systems/data bases
- Paper records
- Microfiche
- Obtaining the information from a network only service rep
- Obtaining information from another department (i.e. repair service)

**Failure to comply with these procedures can result in serious consequences to both U S WEST and you as an individual.** The FCC is seriously looking at how we comply with these rules. Our role in the enhanced service/CPE market is at stake.

### ONA COMPLIANCE MANAGERS

Questions regarding ONA compliance procedures may be directed to:

| | | |
|---|---|---|
| **SBG** | **Debi Adams** | **503 242-4617** |
| **BGS** | **Paul Millen** | **402 422-7599** |

**EXHIBIT 1**

**CPNI BILL INSERT - 1994**

USWEST

**Dear Business Customer:**

Each year, the Federal Communications Commission (FCC) requires U S WEST to inform you about the records we keep regarding the U S WEST telecommunications services you use. This information is called Customer Proprietary Network Information (CPNI) by the FCC and state regulatory commissions.

The information is contained in your telephone account record at U S WEST, and includes: the type and quantity of U S WEST network services you use (such as local telephone lines, custom calling features like Call Waiting and Call Forwarding), their usage, and related billing data.

CPNI, as defined by these regulatory agencies, **does not include** information about customer-owned telephone equipment or enhanced services purchased from U S WEST or your business's personal information, such as payment history, credit rating, or any information about your company's personnel.

**Your Options**

The information about the network services you currently use may be helpful in designing telecommunications solutions for your business needs. Our telecommunications solutions may include U S WEST's enhanced services, such as our Business Voice Messaging℠ Service, Never-Busy Fax℠ Service, or customer-owned communications equipment, such as telephone sets, PBXs or modems. You determine whether U S WEST employees who market enhanced services or customer-owned communications equipment along with our network services may refer to the network service information in your account to consult with you.

Enhanced services and customer-owned communications equipment are also offered by other companies. You may choose to have us provide your telephone account information to those companies. We do not provide your telephone account information to these other companies unless you tell us in writing to do so.

The attached response form explains all the options available to you regarding the use of the network service information (CPNI) in your telephone account record. You may return this response form or send a letter expressing your choice at any time. The choice made by your company in the past, or through this response form, will

## EXHIBIT 1

## CPNI BILL INSERT - 1994

be honored until you change it.

**If your business has up to twenty local lines**, our marketing employees may access your network service information to consult with you about our enhanced services and communications equipment, unless you direct us to restrict them from your account.

**If your business has more than twenty local lines**, our employees who market communications equipment may access your network service information to consult with you about our communications equipment products, unless you direct us to restrict them from your account. *However, the FCC requires that we must receive your written permission to access your network service information and refer to it when consulting with you about our enhanced services.*

If you do not respond to this notice, your firm's most recent response will remain in effect. **If you have more than 20 lines and did not respond to the previous years' notices, our employees who market enhanced services will be restricted from your account, as required by the FCC.** This means they cannot refer to your existing network services to consult with you about enhanced services and their application to your business. You must send written permission to remove this restriction from your account.

**We Honor Your Choice**
If you choose to restrict our employees who sell enhanced services or communications equipment from your telephone account record information, we will honor your choice by having service representatives who sell only our network services take your calls. On occasion, this may mean redirecting your calls to such a representative; this will not impact the quality of service you receive from U S WEST. Your choice applies to your current services and any new services you add to your account. If your company has multiple locations, we will apply your choice to any new locations you add to your company's telephone account(s).

If you would like a U S WEST representative to call, please indicate so on the response form and we will contact you. If you prefer, you can call your U S WEST representative or business office.

***Note:* Your decisions on this form or in other written documentation will not exclude your company from directories or telephone solicitation lists. If you want your company omitted from directories, you will need to contact your U S WEST representative. If you want your company omitted from solicitation lists, please refer to the Consumer Tips in your local U S WEST Direct® White Pages, or contact your U S WEST representative.**

## EXHIBIT 1

## CPNI BILL INSERT - 1994

### ANNUAL CUSTOMER ACCOUNT INFORMATION NOTICE RESPONSE FORM

**May U S WEST employees who market enhanced services or communications equipment refer to your network service information?**
Your options allow you to choose which U S WEST employees may refer to your telephone account information.

**Enhanced Services**

___ **Yes**, U S WEST employees who market enhanced services may refer to my telephone account information to design telecommunications solutions for my business.

___ **No**, U S WEST employees who market enhanced services may not refer to my telephone account information to design telecommunications solutions for my business.

I do not want the following specific network service information shared with U S WEST employees who market enhanced services:

_____

I want my network service information restricted from U S WEST employees who market enhanced services, for a short period of time (dates noted here):

_____

**Communications Equipment**

___ **Yes**, U S WEST employees who market customer owned communications equipment may refer to my telephone account information to design telecommunications solutions for my business.

___ **No**, U S WEST employees who market communications equipment may not refer to my telephone account information to design telecommunications solutions for my business.

I do not want the following specific network service information shared with U S WEST employees who market communications equipment:

_____

I want my network service information restricted from U S WEST employees who market communications equipment, for a short period of time (dates noted here):

_____

## EXHIBIT 1

## CPNI BILL INSERT - 1994

**Do you want your network service information provided to other enhanced services or communications equipment companies?** A positive response will authorize U S WEST to release this information when we receive requests for your network service information from these companies.

___ **Yes**, please provide my telephone account information to enhanced services or communications equipment providers who request it.

___ **Yes**, please provide my telephone account information to only the following companies:

Company _____ Address _____

Company _____ Address _____

Company _____ Address _____

I want only the following specific network service information shared with other enhanced service providers or equipment vendors:

_____

I want my network service information shared with other enhanced service providers or equipment vendors, for a short period of time (dates noted here): _____

_____

___ **Cancel** all previous instructions to release my account information to other enhanced services or communications equipment providers.

**Questions?** ___ **Yes**, please have someone call me at the telephone number I have listed below.

**I am authorized to make decisions regarding my company's telephone account information**

Signature required _____ Date _____

Please Print Name _____ Position/Title _____

Company Name (Print) _____

Address _____

City _____ State _____ Zip _____

Telephone w/Area Code (____) _____

Please attach a separate sheet to list additional telephone numbers and addresses, if necessary.

Printed on recycled paper

CPNI 0694

## EXHIBIT 2

## REMOVAL OF CUSTOMER PROPRIETARY RESTRICTION

To: U S WEST Communications
CPNI Coordinator
Room xxxx
xxxx xx Street
City, State Zip
FAX: xxx-xxxx

This is to authorize removal of my current Customer Proprietary Network Information (CPNI)restriction. This will allow access to my CPNI by U S WEST Communication personnel involved in the sale and marketing of (check one):

_____ Enhanced Services

_____ Customer Premises Equipment

_____ Enhanced Services and Customer Premises Equipment

I authorize the current restriction to be removed:

_____ Permanently

_____ Temporarily until _____

Signature:

_____

Print name:

_____

Title:

_____

Company Name:

_____

Account Telephone Number:

_____

## ATTACHMENT A

## DETAILED SYSTEM INSTRUCTIONS

### BOSS INSTRUCTIONS - CENTRAL & EASTERN

All personnel who sell enhanced services/CPE must have their BOSS user ID's changed. The "CENTRAL & EASTERN BOSS USER IDENTIFICATION REQUEST " form is used. The form should be filled out as follows:

- List each BOSS user.
- Fill in each block on the form.
- In the block labeled "ONA/CPE Restriction" located at the far right-hand side of the form:

| Enter | If user sells: |
|---|---|
| C | CPE |
| O | Enhanced services |
| A | Enhanced services & CPE |

### BOSS ERROR MESSAGES CENTRAL & EASTERN

When an enhanced services/CPE salesperson requests a record from BOSS, a check is done to determine if the customer has requested that their CPNI be restricted. If CPNI restriction is found, an error message is returned to the BOSS user which includes the market unit the account resides in. Examples are:

"XXXX ONA RESTRICTED REFER TO LBS ", or

"XXXX CPE/ONA RESTRICTED REFER TO HPS", or

"XXXXX CPE RESTRICTED REFER TO GES"

### CARS INSTRUCTIONS

Local management will be responsible for setting the ONA/CPE restriction that will prevent CARS users from accessing CPNI restricted accounts. This can be done from the EMPLOYEE TABLE SCREEN.

The EMPLOYEE TABLE SCREEN can be accessed from the LOGON screen by entering a "D" in the OPTION field, "5ET" in the TRX field, and "MGBxxxxx" in the KEY field (Bxxxxx is the employee user ID) + ENTER.

Update the EMPLOYEE TABLE SCREEN as follows:

1. Locate the "Type of User" column. (Far right side of screen)

2.

| Overlay for Occupational: | Management: | To indicate the user sells: |
|---|---|---|
| ON | M F | Enhanced services |
| C P | M E | CPE' |
| OC | M G | Enhanced services & CPE |
| R P | M A | Network services only |

3. + Enter

4. Message returned "Data modified successfully".

5. Go to KEY field and overlay with next employee user ID + ENTER to access the next EMPLOYEE UPDATE TABLE SCREEN and update. Once all appropriate employees have enter "Q" in the OPTION field to logoff.

## CARS ERROR MESSAGES

When enhanced services/CPE salesperson requests a record from CARS, a check is made to determine if the customer has requested that their CPNI be restricted. If CPNI restriction is found, an error message is returned to the CARS user:

"ACCOUNT RESTRICTED FROM ONA/CPE PERSONNEL REFER TO NETWORK."

## CORD INSTRUCTIONS

All enhanced services/CPE salespersons must have their CORD USER ID profile changed to indicate ONA/CPE restriction. The CORD USER/ID TRANSACTION REQUEST FORM (RG53-0044). The form must be filled out and submitted to the CORD USER ID Administrator, 206 451-6604 or FAX the form to 206 453-3706.

It is not necessary to fill out a form for each employee initially. A single form for your office will be sufficient as long as a complete list of employees is attached to that form. The form must indicate the type of restriction required - ONA, CPE, or ONA/CPE. The attached list must carry each appropriate employee's full name and user ID.

The form and attached list should be sent to:

CORD USER ID Administrator
504 Bell Terrace
Bellevue, Washington 98004

If you have questions or need assistance in filling out the form, you may call the Service Assurance Group at 206 451-6585.

## CORD ERROR MESSAGE

When an employee using CORD attempts to access an order or an account, a check will be made to determine if the account is CPNI restricted from enhanced services/CPE salespersons. If CPNI restriction is present, an error message will appear. The message will read:

"TN XXX-XXX ACCOUNT RESTRICTED FROM ONA/CPE PERSONNEL. REFER TO NETWORK"

## SOLAR INSTRUCTIONS

The designated Manager in each location will be responsible for ensuring password security in SOLAR. The following steps should be taken:

- Determine CPNI restrictions for personnel in your location.
- Advise SOLAR Administration of employee status.

In addition, a periodic review of assigned user ID's is appropriate. You must notify SOLAR Administration of all changes, additions, and deletions.

### SOLAR USER ID LIST DESCRIPTION

| COLUMN | DESCRIPTION |
|---|---|
| USER ID | Composed of 3 alpha characters and 3, 4, or 5 numeric characters |
| SEC LEVEL | Security level assigned to each user ID - 1, 2, or 3 |

| | | |
|---|---|---|
| CPNI | CPE<br>ONA<br>ALL | CPNI restrictions - "Y" indicates the user ID is restricted from access; "N" indicates no restriction. |
| ACCESS | NO<br>SO | Indicates Northern or Southern SOLAR access capability. |

## SOLAR ERROR MESSAGES

When an employee using SOLAR attempts to access an order/account, a check will be made to determine if the account is CPNI restricted from enhanced services/CPE salespersons. If CPNI restriction is present, an error message will appear. The message will read:

"ACCOUNT RESTRICTED FROM ONA PERSONNEL, REFER TO NETWORK." , or

"ACCOUNT RESTRICTED FROM CPE PERSONNEL, REFER TO NETWORK.", or

"ACCOUNT RESTRICTED FROM ONA/CPE PERSONNEL, REFER TO NETWORK."

## SONAR INSTRUCTIONS - CENTRAL

Form 8042 is used to change a user ID to identify users that sell enhanced services or CPE. A list of user ID's may be attached when an entire office or several user ID's are to be changed or added. The SONAR SYAD staff will update the user ID's in SONAR so that it can recognize these employees whenever a restricted record has been requested.

In the field labeled "CSR ACCESS" on the Form 8042 show the following to identify enhanced services/CPE users:

| IF THE USER IS: | THE CSR ACCESS IS: |
|---|---|
| Enhanced Services sales rep | CPE |
| CPE sales rep | ONA |
| CPE/ES sales rep | blank |
| Network only rep | CPNI |

The form should be sent to:

SONAR SYAD
1801 California - Room 1060
Denver, Colorado 80202

Managers who prefer to change user ID's from their own terminals may do so. Using the USER ID MAINTENANCE screen, the procedure is the same as changing SLS code, except "CSR ACCESS" is over typed with the new entry. Form 8042 must also be sent to SONAR SYAD for audit purposes.

## SONAR INSTRUCTIONS - EASTERN

The SONAR USER IDENTIFICATION UPDATE FORM will be used to establish appropriate restrictions for enhanced services/CPE salespersons in SONAR. The form should be filled out as follows:

- List each SONAR user.
- Fill in the office and ID field for each user.
- In the field labeled CSR ACCESS:

| IF THE USER IS: | THE CSR ACCESS IS: |
|---|---|
| Enhanced services sales rep | CPE |
| CPE sales rep | ONA |
| CPE/ES sales rep | blank |
| Network only rep | CPNI |

The form should be sent to:

Karen Taylor
SONAR System Administration
Floor 8
1314 DOTM
Omaha, NE 68102

## SONAR ERROR MESSAGES - CENTRAL & EASTERN

When PCL appears on the CSR, CSR retrieval, HELD negotiation retrieval, and Pending Order Change (POC) retrieval will be prevented. The display of the CANDIDATE LIST (SLC01) or the DUPLICATE TEL # LIST (SDT01) will not be affected. This restriction process will apply when either the order or the CSR is requested.

The PCL FID will automatically carry forward on all subsequent orders when it appears on a CSR. If CPNI restriction is found, the following type of error message will be returned:

"8506 CSR ACCESS DENIED: ONA RESTRICTED ACCOUNT. PLEASE DELETE NEGOTIATION.", or

"8517 CSR ACCESS DENIED: CPNI RESTRICTED ACCOUNT. PLEASE DELETE NEGOTIATION."

## SOPAD INSTRUCTIONS

All enhanced services/CPE salespersons must have their security level changed to deny access to CPNI restricted accounts. Form 3336 is used to update a user's security level.

For those employees with SOPAD INQ capability, use the following chart to determine new non-management security levels:

| Security level: | If user sells: |
|---|---|
| 33 | Enhanced services |
| 34 | CPE |
| 35 | Enhanced services & CPE |

NOTE: New security level must be requested by a manager with an 86 security level.

For those employees with SOPAD MI capability, use the following chart to determine new non-management security levels:

| Security level: | If user sells: |
|---|---|
| * | Enhanced services |
| 44 | CPE |
| * | Enhanced services & CPE |

NOTE: New security level must be registered by a manager with an 85 security level.

* If the user sells enhanced services, access to SOPAD MI must be denied due to SOPAD MI inability to block the data behind CFN.

## SOPAD ERROR MESSAGE

When an employee using SOPAD INQ requests an order number, a check will be made to verify that the user can access the account. If the account is CPNI restricted from ES/CPE sales-persons, one of the following error messages will appear:

"*P91 #XXXXXXXX RESTRICTED FROM ONA (OR CPE) PERSONNEL, REFER TO NETWORK.", or

"*P92 #XXXXXXXX RESTRICTED FROM CPE/ONA PERSONNEL, REFER TO NETWORK."

REMEMBER! Access to SOPAD MI must be denied to enhanced services salespersons!

When an employee using SOPAD MI requests an account, a check will be made to verify that the user can access the account. If the account is CPNI restricted from ONA/CPE salespersons, one of the following error messages will appear:

"*P93 #X XX-XXXX ACCOUNT RESTRICTED FROM CPE (OR CPE) PERSONNEL. REFER TO NETWORK.", or

"*95 #X XXX-XXXX ACCOUNT RESTRICTED FROM CPE/ONA PERSONNEL. REFER TO NETWORK."

## ATTACHMENT B

## COLORADO - EXCEPTIONS

### FULL DISCLOSURE

The Colorado Public Utilities Commission issued additional Open Network Architecture (ONA) rules that went into effect on March 4, 1991. The following needs to be covered:

- Customers that purchase enhanced services must be advised that they have a 7 day money back guarantee. Customers must be advised of this at the time an order is placed for the enhanced service. The guarantee starts the day the service is installed, and includes both recurring and non recurring charges.

  **Customers purchasing Business Voice Messaging Service (BVMS) are offered a 90 day money back guarantee.**

- When offering enhanced services (e.g. BVMS) on incoming calls (telemarketing and premise visits are excluded) you must advise customers, in an unbiased manner, that other enhanced service providers may offer similar services. We must never imply that another vendor's product is inferior to U S WEST's BVMS.

  EXAMPLE: " ... It sounds like you have a need for our Business Voice Messaging Service, ... **there may be other companies that sell similar services.** Would you like to hear more about our service?"

  If a customer asks how to find out about other companies, suggest they refer to a telephone directory.

## ATTACHMENT C

## OREGON EXCEPTIONS

The Oregon Public Utilities Commission has guidelines which U S WEST Communications must follow in order to sell enhanced services, such as Business Voice Messaging Service (BVMS). To satisfy those rules there are two procedures you need to follow, they are:

1. **Customers that purchase enhanced services must be advised that they have a 7 day money back guarantee.**

   **For BVMS sales:**

   **When an order is placed** and no contract is signed for BVMS you **must** advise the customer that they have a 30 day money back guarantee. The guarantee starts the day the service is installed. This applies to the Call Answering (MBB) and Voice Mail (VSHSX) mailboxes and associated BVMS features. The money back guarantee includes both the recurring and non-recurring charges.

   **When an order is placed** and a Volume Discount Pricing Contract for Voice Mail (VSHSX) is signed, you **must** advise the customer that they have 7 days to cancel their order without cost or penalty. The guarantee starts on the day the contract is signed. Because of the investment for large orders, the due date for installation should not be set before the expiration of the 7 day guarantee.

2. **Whenever there is a sales discussion of enhanced services,** such as BVMS **(customer or company initiated)**, you must advise the customer, in an unbiased manner, that other enhanced service providers may offer similar services. Never imply that another vendor's product is inferior to U S WEST's enhanced services (e.g. BVMS). For example, you might say something like:

   "... It sounds as though you have a need for our Business Voice Messaging Service... **there may be other companies that sell similar services**. Would you like to hear more about our service?

The additional rules are:

- You may not create a list of Oregon customers based on Customer Proprietary Network Information (CPNI) for enhanced services sales for our direct mail or telemarketing* purposes without first receiving written consent from the customer. At this time procedures have not been developed to obtain this written permission. (The Oregon Commission does not accept the current CPNI authorization process as consent for telemarketing and direct mail for enhanced services sales in Oregon.)

- 21+ line Business and Residential customer's must receive annual written notification of their rights that they have regarding handling of their CPNI. 21+ line New Connect orders must receive notification of their CPNI rights within 30 days.

* The Small Business Group's Communication Consulting Centers (CCC'S) are not considered telemarketing centers.

## ATTACHMENT D

## UTAH - EXCEPTIONS

U S WEST has agreed to an additional stipulation in order to sell BVMS in the State of Utah. This disclosure statement **must** be made:

### FULL DISCLOSURE

- On **New Connect orders where we initiate a discussion of BVMS,** you must advise the customer, in an unbiased manner, that other enhanced service providers may offer similar services. Never imply that another vendor's product is inferior to U S WEST's voice messaging service. For example, you might, say something like:

  "...it sounds as though you have a need for our Business Voice Messaging Service... **there may be other companies that sell similar services.** Would you like to hear more about our service?"

  If a customer asks how to find out about other companies, suggest they refer to a telephone directory.

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PAGE

REFERENCE

FCC Docket 88-2 U S WEST Open Network Architecture Plan (2-01-88)
FCC Docket 86-79 CPE Non-Structural Safeguards (6-29-88)
FCC Docket 90-623 Computer III Remand Proceedings (12-20-91)
US WEST Communications Compliance Training ONA/CPE (4-10-89)

SUMMARY

This reference will provide you with specific responsibilities and procedures required to comply with FCC mandated "non-structural safeguards" surrounding the sale of Enhanced Services (ES) and Customer Premises Equipment (CPE).

BACKGROUND

FCC Docket 86-79 enabled U S WEST to sell CPE without forming a separate subsidiary to do so. CPE is defined as hardware located on customer premises that include telephone sets, modems, PBX's, facsimile machine, etc.

In response to the FCC's Computer III proceedings, U S WEST files with the FCC its Open Network Architecture (ONA) plan. Compliance with the ONA plan allows U S WEST to sell a voice messaging service without forming a separate subsidiary to do so.

VMS/BVMS are enhanced services. Prior to the approval of our voice messaging plan, U S WEST Communications (and its associated market units) was prohibited from selling enhanced services. Enhanced services are services in which computer processing changes or modifies the data or information passed over the network or allows interaction with stored information. Enhanced services differ from basic (i.e., network) services in one fundamental way: a basic service moves information across the network; an enhanced service allows changes to the information that is being moved over the network or allows interaction with information that has been stored. Let's use BVMS as an example:

> A basic service, Call Forward/Don't Answer, moves the information (the call) from the unanswered or busy number to another number. The enhanced service, BVMS, takes the call that has been moved, answers it, stores it, distributes it, and allows interaction with the stored message.

REQUIREMENTS

There are a number of requirements that U S WEST must comply with in order to sell CPE and enhanced services. Most pertinent to the sales environment are the requirements called "non-structural safeguards". Non-structural safeguards are rules that ensure that U S WEST (and other RBOC's) will not leverage its market power to obtain an unfair advantage in the offering of enhanced services or CPE.

Each and every employee involved in the planning, provisioning, and/or sale of enhanced services/CPE must clearly understand the FCC mandated requirements and U S WEST policies listed below:

- ONA Service Requirements - for enhanced services sales (not CPE)
- Customer Proprietary Network Information (CPNI)
- Treatment of Non-Published/Non-Listed Numbers
- Treatment of Call Forwarded - To Numbers - for enhanced services sales (not CPE)
- Non-Discriminatory Provisioning
- Compliance With Security Procedures

ONA REQUIREMENTS
ENHANCED SERVICES

ONA services are unbundled basic network capabilities required by enhanced service providers (U S WEST or external) that enable delivery of that service over the
U S WEST network. ONA services are available to all customers on equal terms and conditions. Examples of these unbundled services are Call Forward Busy/Don't Answer and Message Waiting Indication. Unbundled means that they may be purchased as stand alone features.

You must clearly understand that customers may purchase ONA services from U S WEST directly to be used as stand alone features, as a component of an enhanced service provided by an external enhanced service provider, or as a component of a U S WEST enhanced service (i.e., VMS/BVMS). The customer - and the customer can be any individual or company including U S WEST - will always purchase ONA services for the same price and under the same terms and conditions, no matter what the service is ultimately used for.

ONA REQUIREMENTS
ENHANCED SERVICES
(Cont'd)

In addition to understanding that all customers will receive equal treatment, you must also be aware that customers will order these services to be used with external enhanced service providers. Those external enhanced service providers will at times be U S WEST competitors.

When a customer calls to order a Call Forwarding service in order to subscribe to an external enhanced service provider's product, you **MAY NOT** attempt to sell our enhanced service products instead. You may offer additional services. If it is not apparent what the customer is using their forwarding service for, you may consult with the customer to determine if they are using call forwarding to hook up to a competitor's service. If they are not, you can sell our enhanced services products.

**IMPORTANT - U S WEST IS COMMITTED TO, AND FULLY SUPPORTS THROUGH ITS ONA PLAN, COMPETITIVE AND NON-COMPETITIVE USE OF ITS NETWORK THROUGH THE PURCHASE OF ONA SERVICES.**

CUSTOMER PROPRIETARY
NETWORK INFORMATION
(CPNI)

CPNI is information collected by U S WEST in connection with providing network services to a given customer. There are two types of CPNI - customer specific CPNI and aggregated CPNI.

Customer specific CPNI is any basic service network information, in any form, pertinent to an individual customer. If you are involved in the sale of enhanced services or CPE, it is critical that you understand how CPNI affects your contact with our customers.

Aggregated CPNI is a summary of information on the network services of a group of customers. The identity of specific customers is unknown.

CUSTOMER SPECIFIC CPNI

Customer specific CPNI includes information such as the type, quantity and location of network services billed to an individual customer. **It is NOT name*, address*, telephone number, credit information, or information regarding U S WEST enhanced services and CPE.** Customer specific CPNI can be found in customer services records, repair records, and service orders.

Examples of customer specific CPNI are (but not limited to):

- Local or Toll Usage
- Quantity/Type of Network Services
- Location of the lines/circuits
- Type of lines/circuits (Class of Service)
- Number of lines/circuits at a business/residence
- Billing Information

Basically, any record regarding a specific customer that contains information regarding network services is customer specific CPNI.

* Colorado only - BN and BA is CPNI information.

AGGREGATED CPNI

Aggregated CPNI is a collection of customer specific CPNI which has been sufficiently combined so that specific customers cannot be identified.

Current publicly available aggregated CPNI includes:

- Number of lines/circuits by business/residence
- Average call duration
- Average number of messages
- Average minutes of use
- Number of lines with touch tone

Any aggregated CPNI used for planning or marketing of enhanced services/CPE must be made available on equal terms and conditions to external enhanced service/CPE providers. Normally a sales office would not have a need to obtain aggregated CPNI. However, should the need arise to use aggregated CPNI for the purpose of marketing and or planning for an enhanced service/CPE HPS & SBG managers should call Janet Brides 303 896-0885. If you get a request for aggregated CPNI from an external enhanced services/CPE provider the information can be obtained by calling the VSC CPNI Coordinator at 800
544-7126.

PROPRIETARY CLASSIFICATION FID

A FID - PCL is used in the unfielded ID section of the customer record to indicate specific CPNI information. PCL may be followed by the data "ONA", "ALL", "CPE", or "NON".

| IF PCL IS: | THESE MARKETING SALESPERSONS ARE BLOCKED |
|---|---|
| ONA | Enhanced Services |
| CPE - 21C | CPE |
| ALL | Enhanced Service and CPE |
| NON | No One |

The PCL FID is entered or changed only by the VSC, except on N orders with 21+ lines on that order. Those N orders must have a PCL ONA on them when they are issued.

NOTE: NON PCL is only used when the customer notifies us in writing to unrestrict the account.

ESTABLISHING OR CANCELLING CPNI RESTRICTION - RESIDENCE

The following guidelines must be used when you receive a customer request to restrict CPNI records:

- Explain which types of information are considered CPNI and which are not.
- Explain the benefits of allowing U S WEST and other vendors access to CPNI.
  - U S WEST and other companies will be better able to provide more complete telecommunications solutions. Those solutions can be specific to the individual's needs if CPNI is available.
- Advise a dated, signed letter requesting what the restriction should be for (enhanced services and/or CPE) is required.
- Advise you will send a letter to them with:
  - The address to mail the letter (See VSC location).
  - Information on how to cancel the restriction. (Exhibit 1) Letter should be typed locally with the appropriate VSC address.
- Note BOSS or CARS and mail the followup letter the same day.

  NOTE: BOSS and CARS are equivalent systems in specific regions of U S WEST.

CUSTOMER SPECIFIC CPNI RIGHTS NOTIFICATION (BUSINESS)

One of the FCC mandated requirements surrounding customer specific CPNI is that U S WEST must notify multi-line business customers of certain rights that those customers have regarding the handling of their CPNI. Although residential customers do not receive this notice they, too, have the right to choose who may access and use their account CPNI.

U S WEST sends a bill insert (Exhibit 2) annually to all business customers listing the customers options. This practice began in July 1988. A response form is attached to the insert should a customer wish to utilize those options. The customer may opt not to respond.

The customer may authorize U S WEST to:

- Release CPNI to a specific external vendor or to all vendors.
- Restrict CPNI from U S WEST enhanced service or CPE sales personnel (i.e., a Small Business employee selling BVMS or CPE).
- Change any previous release or restriction of CPNI.

The customer may release or restrict their CPNI at any time as long as it is in writing to U S WEST. The annual notification sent by U S WEST serves the purpose of reminding existing customers of their rights, as well as advising any new customers who may not be aware of their rights.

Customer responses are collected in the Vendor Service Centers (VSC's).

CPNI RESTRICTION OF 21+ LINE ACCOUNTS

Per FCC Docket 90-623, the FCC mandated that beginning in June 1992 customers (residence or business) who have 21 or more lines either at one location or at multiple locations, be CPNI restricted from U S WEST enhanced services (not CPE) personnel unless we have written permission from the customer.

If a 21+ line customer does <u>not</u> want to be restricted, written authorization is required. The orders will be issued by the VSC. From now on, when any (regardless of the size) customer notifies us in writing that they do <u>not</u> want to be CPNI restricted, a service order will be issued by the VSC to add a PCL NON to the account(s).

CPNI RESTRICTION OF 21+ LINE ACCOUNTS (Cont'd)

N orders taken with 21+ lines (on that order) must be CPNI restricted until we receive written authorization from the customer to unrestrict the account. Put a IPCL ONA on the order. (Central Region PCL ONA)

On new connect orders with 21+ lines, DO NOT initiate a discussion about Account Code Billing. If the customer initiates the discussion, we may sell the product.

Explain the CPNI restriction while negotiating the N order. You must also:

- Within 30 days mail the customer a copy of the CPNI bill insert (Exhibit 1).
- If the customer chooses to be unrestricted they must return the form to the VSC and the VSC will issue the order to change the PCL to NON when they receive the written notification.

We may not initiate a discussion about enhanced services while negotiating that N order. However, if the customer initiates the discussion we may sell the enhanced service. Put a retained remark on the N order to indicate that the customer initiated the discussion. Be sure to put the PCL ONA on the order.

Each year we will identify any customers who are new or who may have grown to 21+ lines. We will go through the notification process and restrict accounts as appropriate via a CRIS spin.

If you are dealing with a customer that has grown to 21+ lines since that last CRIS spin you **may** discuss the CPNI restriction requirements if you know the customer will be included in next year's spin. If you choose to have this discussion with the customer, explain the customer's options in an unbiased manner and send the notification so the customer can respond before the annual notification. For example:

- explain the ramifications if the customer chooses to restrict the account.
- we will not be able to advise the customer about new enhanced services or CPE.
- we will not be able to consider enhanced service and CPE when consulting with customers to develop solutions to customers communications problems.
- the Account Manager may need to be reassigned if the current Account Manager sells enhanced services/CPE.

RESTRICTED CPNI

Customers may restrict their CPNI from U S WEST enhanced services or CPE personnel. This means that those persons will not be able to utilize restricted CPNI for <u>any</u> reason.

Our primary systems - BOSS, SONAR, SOPAD, CARS, CORD, and EDGE - will mechanically block restricted records from BVMS/CPE salespeople. See System Instructions for details.

- Due to the fact that EDGE is updated monthly, there may be accounts that become restricted between the updates, because of this EDGE users must always check BOSS/CARS prior to accessing an account.

CUSTOMER CONTACT HANDLING

Whenever a customer record cannot be retrieved because it is CPNI restricted, there are two things you must be alert to:

1. **DO NOT** attempt to sell Enhanced Services/CPE to the customer. It is reasonable to assume that the customer does not want an enhanced service/CPE from U S WEST or they wouldn't have restricted their records.

2. **REFER** the customer to a "network only" salesperson. Most customer requests cannot be handled without looking at or changing the customer record or bill. "Network Only" means an individual not involved in the sale of enhanced services or CPE.

The number of network only personnel required to service customers who have restricted CPNI is entirely dependent on the frequency of attempts to access restricted accounts. The following sample referral is appropriate whenever a CPNI restriction messages is received:

> "You have requested that U S WEST employees who sell enhanced services and telephone equipment not be allowed access to your records. I sell those services, so I'm going to refer you to someone who is authorized to view your account."