

Appendix D: Comparison of CPNI Rules

Type of Activity	CPNI Rule				
	Current WA CPNI Rules	Proposed WA CPNI Rules		Proposed CA Bill of Rights, Rule 12 Confidential Subscriber Info.	Final FCC CPNI Rules (7/25/02)
		Call Detail	Private Account Information		
To provide service or to comply with the law	No approval required	No approval required	No approval required	No approval required	No approval required
Inbound customer service and marketing	Oral approval	Oral approval	Oral approval	No provision for obtaining consent during duration of the call	Oral approval
Market new versions of existing telecommunications services	No approval required	Opt-in	Opt-out	No approval required	No approval required
Market telecommunications-related services within bucket(s)	No approval required	Opt-in	Opt-out	No approval required	No approval required
Market communications-related services – “out-of-bucket”	Opt-in	Opt-in	Opt-out	Opt-in	Opt-out
Market product and services used in or necessary to provide the telecommunications service(s) to which a customer subscribes	Opt-in	Opt-in	Opt-out	Opt-in	No approval required
Market non-communications related services	Opt-in	Opt-in.	Opt-out	Opt-in	Opt-in
CPNI Definition	Same as FCC	Creates a new CPNI category – Call Detail CPNI	Creates a new CPNI category – Personal Identifiable CPNI	Broader than FCC’s CPNI definition; includes social security number, credit and financial information	Based on Section 222