

# **CUSTOMER PROPRIETARY NETWORK INFORMATION**

## **Compliance Manual and Operating Procedures**

**For:**

*Residential Customer Service,  
Business Customer Service,  
And  
Customer Service Support  
Departments*

**Pine Tree Networks  
56 Campus Drive  
New Gloucester, ME 04260**

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# Definitions

**Account Information:** Information that is specifically connected to the customer's service relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.

**Address of Record:** An address that the carrier has associated with the customer's account for at least 30 days. (can be postal or electronic)

**Adjunct to Basic Service:** The FCC describes these as services that are "basic in purpose and facilitate the completion of calls through utilization of basic telephone service facilities" This includes: **speed dialing, call forwarding, computer- provided directory assistance, call monitoring, caller ID, call tracing, call blocking, call return, repeat dialing, call tracking, Operator Services for the Deaf, and certain Centrex features.**

**Affiliate:** A person that (directly or indirectly) owns or controls, is owned by, or is under common ownership or control with, another person. The term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent. (CDI, GOGTT, mybroadband.com, CRC of ME)

**Authenticate:** A means of verifying the customer's identity via a set password, or answer to a security question.

**Biographical information:** "Readily available biographical information" is information drawn from the customer's life history and includes such things as the customer's social security number, or the last four digits of that number; mother's maiden name; home address; or date of birth.

**Breach of CPNI:** A "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.

**Call Detail Information:** Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call.

**Carrier:** Any provider of telecommunications services, except that such term does not include aggregators of telecommunications services (as defined in 47 USC 226).

**Communications-Related Services:**

Telecommunications services, information services typically provided by telecommunications carriers, and services related to the provision or maintenance of customer premises equipment.

**Customer:** A person or entity to which a telecommunications carrier is currently providing service to or for.

**Customer Premises Equipment (CPE)**- Equipment employed on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications.

**Customer Proprietary Network Information (CPNI):** Information that relates 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, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information.

**Data Broker:** An individual that seeks other people's personal information/CPNI for the purpose of selling it to other interested parties. "Information retrieval consultant."

**Digital Subscriber Line- (DSL)** – Technology that allows simultaneous transmission of dialed calls and high speed data over the same loop.

**Duration of Call Consent: (DOCC)**- A short statement used on an inbound call to solicit a customer's consent to use their CPNI for the duration of the call to offer services "outside of the customer's bucket." The consent is only valid for the duration of the call. This type of consent is also known as "per call consent"

**FCC:** Federal Communications Commission.

**General Consent: Opt-In Approval:** A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that the carrier obtain the customer's affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the carrier's request

**Identification/Valid Photo ID:** A government-issued means of personal identification with a photograph such as a driver's license, passport, or comparable ID that is not expired.

**In-Bucket** – All telecommunications services that are provided within a distinct service category. For example: Local Bucket- includes Custom calling features, Caller ID, Additional lines, etc.

**Information Service:** The offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications. This includes electronic publishing, but does not include any use of any such capability for the management, control, or operation of a telecommunications system or the management of a telecommunications service.

**Information Services Typically Provided by Telecommunications Carriers:**

Information services that telecommunications carriers typically provide, such as Internet access or voice mail services. The term does not include retail consumer services provided using Internet websites (such as travel reservation services or mortgage lending services), whether or not such services might otherwise be considered to be information services.

**Inside Wiring-** Customer-Owned or controlled wire on the subscriber's side of the demarcation point.

**Non-Telecommunications services-**Any service, activity/product that is outside of the three Telecommunications Service buckets. Those services, products/activities include: CPE, CPE Alliance referrals, Voice Messaging, storage and answering services, Fax mail/messaging, Internet Access, Electronic directory publishing etc.

**Opt-Out Approval:** A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within the prescribed waiting period, (33 Days) after the customer is provided appropriate notification of the carrier's request for consent.

**Out of Bucket-** An "out of bucket" request by a customer or carrier initiated sales effort, is one that involves telecommunications services that reside in another bucket(s) that the customer does not already subscribe, or CPE/non-telecommunications product, service/activity.

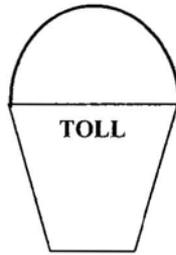
**Pretexting:** A method of obtaining someone else's personal information under false pretenses. It is done by impersonating the victim or telling lies that will convince a company employee, organization member or other individual to divulge confidential data. A pretexter may then use this data to engage in identity theft or corporate espionage.

**Subscriber List Information:** Any information (1) identifying the listed names of a carrier's subscribers and the subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and (2) that the carrier or an affiliate has published, caused to be published, or accepted for publication in any directory format.

**Telecommunications Service:** The offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used. Pine Tree Networks telecommunications services are marketed within 3 distinct buckets. Local, Toll, and Affiliates.



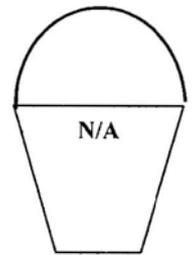
**LOCAL**  
 Dial Tone  
 Custom Calling Features  
 Economy/Premium Calls  
 Grandfathered Wire  
 Maintenance  
 CPE- Rental Phones  
 Internet (Granby Only)  
 Adjunct-to-basic services:  
 Caller ID



**TOLL**  
 Toll Calls (old CIC 9199)



**AFFILIATES**  
 Mybroadbandphone- VOIP  
 Internet/ DSL  
 Internet / DSL Repair  
 WGPLUS-Wire Guard Plus  
 CPE- Jacks, Filters, Wiring  
 Voicemail  
 CRC Wireless  
 Toll calls- (new CIC 5842)



**N/A**  
 Inside Wiring: Repair,  
 Maintenance  
 Installation  
 Non-Telecommunication  
 Services  
 Directory Listings



**GRANBY LOCAL**  
 Dial Tone  
 Touch Tone  
 Custom Calling Features  
 Economy/Premium Calls  
 Toll Calls  
 Wire Maintenance  
 CPE- Rental Phones  
 Adjunct-to-basic services  
 Caller ID  
 Voicemail  
 Internet/ DSL  
 Internet / DSL Repair  
 CPE- Jacks, Filters, Wiring

**Telephone Number on Record:** The telephone number associated with the underlying telephone service, not the telephone number supplied as a customer’s “contact information.” (not a CBR)

**USSS:** United States Secret Service

**Winback:** A sales attempt to regain customers who have switched to another carrier via PIC changes, Port-out requests, etc.

## **STATEMENT OF CORPORATE POLICY**

Pine Tree Networks is committed to honoring the privacy and security of our customer's personal information. We have adopted the protective policies, procedures and enforcement actions described in this manual to protect the privacy of CPNI in accordance with § 222 of the Telecommunications Act of 1996, 47 CFR 64.2001-.2009. The FCC's regulations, 47 CFR 64.2009. This Policy applies to all employees of Pine Tree Networks and its subsidiaries. Any violation of this policy will subject the employee to the Discipline Policy up to and including immediate discharge. Any employee having knowledge of any violation of the CPNI policy shall promptly report such violation to the appropriate level of management. Senior management (Director Level) of Pine Tree Networks is responsible for compliance in their area of responsibility.

The duty to protect and ensure the security of Pine Tree Networks customer's CPNI falls in accordance with the Corporate policies and practices for Confidentiality described in our Employee Handbook and signed by every employee in the "Confidentiality Statement."

**The unauthorized disclosure of CPNI is considered a breach of company policy and warrants the following disciplinary action:**

*Group 4:*

**1st Offense: Written Warning or Suspension or Termination  
(depending on severity of offense)**

Any questions regarding compliance with the applicable law and this Manual should be referred to:

Mary Post, (207) 688-8219 or Carol Grover (207) 688-8290.

Any violation of, or departure from, the policies and procedures in this Manual shall be reported immediately to:

Dan Suda, (207) 688-8235 or Carol Grover (207) 688-8290.

## **EXECUTIVE SUMMARY OF FCC CPNI CHANGES**

The Federal Communications Commission issued an Order that substantially revised and expanded its rules to safeguard the confidentiality of customer proprietary network information (CPNI). The new CPNI rules apply to all carriers, from residential to voice over IP providers. This FCC action is in response to a petition filed by the Electronic Privacy Information Center (EPIC) regarding “the sufficiency of all carrier practices to protect against the unlawful disclosure of CPNI and the proliferation of personal information available for sale by data brokers.”

The Order greatly impacts the manner in which we currently conduct our business, from handling customer inquiries, to EBPP self registration, to the Marketing of our products/services, and even to our Technician’s abilities to make service suggestions. The major changes include the implementation of “password protection”/“ID validation” standards for all types of customer contacts; the adoption of “notification procedures” for reporting unauthorized disclosure of CPNI to the United States Secret Service (USSS), the Federal Bureau of Investigation (FBI), and the affected account holder; in addition to the development of a training manual, and the enforcement of a “progressive discipline policy” that upholds said training manual. Another change that comes with this order is annual CPNI certifications. Previously, carriers maintained their CPNI certification “on carrier premises.” The annual certification submissions are mandated to include a summary of all actions taken against “data brokers”/“pretexters” and a summary of all customer complaints received in the past year pertaining to unauthorized release of CPNI. The next certification filing will be due on March 1, 2008. This order and all policies and procedures implemented to uphold it will take effect on December 8, 2007.

On a cautionary note, the FCC made clear that it will vigilantly enforce CPNI violations, and it refused to adopt a safe harbor pursuant to which carriers would be exempt from liability for improper disclosure of CPNI if the carrier had followed certain security guidelines. Further, the FCC put carriers and interconnected VoIP providers on notice that it will infer that “a carrier did not sufficiently protect customer CPNI if a pretexter does obtain unauthorized access to a customer’s CPNI.” It requires that the carrier then must demonstrate that it has taken steps to protect CPNI from public disclosure. Therefore, it is of the utmost importance that we make the necessary modifications to our CPNI policies and procedures, as to ensure that we are in complete compliance with the new Order.

The policies and processes described within this CPNI manual are Pine Tree Networks new operating procedures developed to ensure compliance with 47 CFR 64.2001-.2009. They are written to ensure that no use of CPNI is made until a full review of applicable law has occurred.

# Pretexting – A History

Pretexting (sometimes also referred to as “social engineering”) is a method of obtaining someone else’s personal information under false pretenses. Pretexting is done by impersonating the victim or telling lies that will convince a company employee, organization member or other individual to divulge confidential data.

When pretexters try to access another person’s calling records and other account information, they might pretend to be the telephone service customer. In some cases, the pretexter already has the personal information needed to pretend to be the customer and access the customer’s records. For example, an ex-spouse or an employer may already have or know the required information used to establish the account.

Pretexting became front-page news in 2006 when Hewlett-Packard admitted that its investigators had obtained the phone records of journalists and its own board members under false pretenses in order to uncover the source of boardroom leaks. Though the HP scandal was extremely well publicized, most cases of phone records pretexting occur without any media attention.

## **Pretexters obtain the customer’s information by using:**

- Neighbors, family, co-workers, or even the customer may have freely given out personal information by mistake in general conversation. (Kids names etc.) Often this personal data is used as passwords!
- People who are paid to track the customer down often use tricks to obtain phone records, sometimes without legal authority such as a court order or subpoena. These people include private investigators, bail bondsmen, debt collectors and others who gain financially by obtaining the customer’s records for resale to interested parties. Criminals who want to intimidate witnesses or harm police officers or their families might try to access their phone records illegally.
- Public records, **which are a legal source** for accessing information about the customer such as: home purchases, filed bankruptcy, business start up and marital status.

## **Pretexting Laws**

*1999 Gramm-Leach-Bliley Act:* The law makes it illegal to use pretexting to obtain financial records.

*2006 Telephone Records & Privacy Protection Act:* made pretexting to buy, sell or obtain phone records a federal crime punishable by up to \$500,000 and up to 10 years in prison

*December 8, 2007 The Federal Communications Commission (FCC):* requires telephone companies to put in place more stringent authentication measures to protect their customers from pretexters and data brokers.

## GENERAL USE OF CPNI

Under federal law, our customers have the right, and we have the duty, to protect the confidentiality of the customers' telecommunications service information. This information includes the type, technical arrangement, quantity, destination, and amount of use of telecommunications services and related billing for these services. This information is called Customer Proprietary Network Information (CPNI). Unless legally compelled to, PTN and our subsidiaries will not release CPNI to any outside company.

CPNI includes: where, when, and to whom a customer calls; amount and length of calls a customer makes; services a customer subscribes to (long distance, calling features, etc.); and who the customer's provider is for a given service. Some important points regarding CPNI:

- A Subscriber's published directory information is not CPNI – this includes name, address, and published phone numbers.
- The CPNI rules apply to all types of customer contacts- this includes telephone, in-store/reception area service, as well as the general marketing of services.
- You do not need to seek prior authorization to view a customer's CPNI if you are offering a service of similar status to those the customer already purchases from PTN. (i.e. Same Bucket)
- You **cannot** market services outside of the customer's "bucket" **without** CPNI approval from the customer – this includes but is not limited to Voice Mail, Inside Wiring Maintenance, Bundled service, Internet, and Wireless services or equipment.
- You must have permission from the customer to use his/her CPNI to market PIC plans/services to them if they are not already PIC'd to Pine Tree Networks.
- Business customers are exempt in cases where the customer has a dedicated "Account Representative" or a contractual agreement regarding account responsibility with Pine Tree Networks.
- Opt-In and Opt-Out rules still apply.
- Carriers are permitted to use former customer's CPNI for "Winback" sales attempts only if offering the products/services to which the customer previously subscribed. (Not for new services outside of the former customer-carrier relationship.)
- "Winback" attempts are not permitted until AFTER the PIC change or Port-out request has been completed, and at least 30 days have passed to allow the customer to be moved to another carrier.

For Marketing purposes, Pine Tree Networks would need to have CPNI approval before we could target a specific group of customers with Internet or Long Distance advertising. For example, PTN could not send out a DSL advertisement just to customers that currently do not subscribe to our DSL service without their CPNI approval. However, the company could use a mass-marketing approach to advertise to ALL customers in a general area. Service negotiators/representatives are required to ask permission before selling any "out of bucket" service or equipment. This statement is called the Duration of call consent, or "DOCC" statement.

\*\*\*\*\*

*Employees who are unsure whether specific information is CPNI, or are in need of assistance with a specific customer contact should ask their Team Leads, or direct Supervisor for procedural clarification. Any violation of this Order will subject the employee to the Corporate Discipline Policy up to and including immediate discharge*

## **CUSTOMER SERVICE CPNI REQUIREMENTS AND VERBIAGE**

CPNI is account information that details the customer's usage and the prices of their telecommunications services. This includes:

- Current services used/competitors pricing
- Current toll usage data/competitors pricing
- Calling patterns
- Usage data

To keep telecommunication service competition fair, the FCC has mandated that we cannot utilize CPNI information to market/sell any of our products/services without **1<sup>st</sup> confirming a random account password known only to the "responsible billing party," and 2<sup>nd</sup> receiving permission from the billing party to "review their records for the purpose of offering additional service options."** Also, we must document the customer's account each time the "password" and or "permission" have been given.

The password assigned to the customer's account is required by the FCC to be RANDOM. This means that it cannot be based on "readily available biographical information" (e.g., social security number, mother's maiden name, home address, date of birth) or account information (e.g., account number or any component thereof, amount of last bill, or a phone number associated with that account.) We will have the ability to view the password on a pop-up/alert in QDS.

### **Establishing an Account Password:**

**If the caller is a New Customer-** Upon the creation of the new account, we will now be required to establish an account password, and select a secondary "non-biographical" security question and answer.

**Existing Customer-** A randomly generated PIN will be embedded in the comments section of every existing customer's billing statement. This PIN (now known as the CPIN) will be used to "authenticate" current customers without pre-established account passwords after 12/08/2007. Once we have authenticated the customer via the CPIN, the customer may then set up a password and back up security question with the negotiator. If the customer cannot verify the PIN, other acceptable authentication methods include: (\*once Password established, Change CPIN comment to "never" print on statement)

- Call the account telephone number (not CBR #) and upon answering the call, we will then establish an account password, designate the secondary security question and answers within QDS, and then handle the customer's service request.
- Call the account telephone number (not CBR #) and leave the CPIN number on the customer's voice mail/answering machine. Upon obtaining the CPIN information, the customer will then need to call customer service for password and security question set-up.

- The customer can come into our billing office and show a valid photo ID, which validates their identity, and allows for full account authorization and disclosure. A password and security question can then be set-up.

## For customers with established account passwords, we are to state the following:

### *CPNI Customer Account Authentication Statement:*

“For security purposes, can you verify your account password?”

### If the caller cannot provide the password, we will then ask a previously obtained “non-biographical” security question noted on the customer’s account:

Examples of our “non-biographical” security questions: *(also used for EBPP verification)*

- What was the color of your first car?
- What was the name of your first pet?
- What was the name of your favorite fruit?
- Spell your lucky number? (non-numeric)
- What is your favorite musical instrument?

\* Customers with pre-established EBPP account passwords will maintain their same password. QDS will automatically populate: Password, SS#, Name, and the DOB fields of the CPNI screen. All email addresses used for CPNI must be entered **only** on the CPNI window.

**CPNI Information**

**CPNI Password/Backup Authentication**

Password:  Password must be at least 7 characters long and contain at least 2 numeric digit(s).

\* Password is case sensitive.

Security Question:

Security Answer:

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E-Mail Address:  189 Days on file

Non-Solicitation Code:

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**Affiliate CPNI:**

Restrict Sharing

Date Notice Sent:

Date Changed:

Social Security:

Driver's License:

---

**3rd Party CPNI:**

Restrict Sharing

Date Notice Sent:

Date Changed:

Birth Date:

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**CPNI Authorized Users and Secured Information**

Authorized User Name	Social Security #	Driver's License	Birth Date	
James Aaron	***-**-1111			<input type="button" value="Add"/>
William Aaron	***-**-8888	SKS-44323-33	09/22/1951	<input type="button" value="Change"/>
				<input type="button" value="Delete"/>

**If the caller cannot provide the account password, the answer to the security question, or the CPIN number from their statement, we can do any of the following:**

- Call the account telephone number (not CBR #) and upon answering the call, we can advise the customer of their account password, and next handle the customer's service request.
- Send the account password **OR** service request information via e-mail to the customer's e-mail address on record (as long as it has been established for greater than 30 days) (**we cannot send Account info # password together**)
- Send the account password **OR** service request information via U.S. Post office to the customer's billing address on record (as long as it has been established for greater than 30 days)
- The customer can come into our billing office and show a valid photo ID, which validates their identity, and allows for full account authorization and password disclosure.

\*\*\*\*\*

*\*Business Customer exemption – authentication rules do not apply to business customers that have a dedicated account representative and contracts that specifically address the carrier's CPNI protections. This exemption does not apply to business customers that must go through a call center for customer service.*

*\*\* "House accounts" will now be assigned to a "dedicated account representative" within the Customer Service Business Unit. (in the Sales Person Drop menu)*

*\*\* Contracts are being re-written to disclose Business customer's rights and limitations of CPNI protection.*

\*\*\*\*\*

**If the caller accurately provides the password,** we then are required to obtain their permission to "review their records for the purpose of offering additional service options." (See DOCC Authorization Statement)

**Documentation of Customer Account Authentication in QDS-**

**Document Authentication approval in QDS-** After the customer has given the appropriate authentication (password or security question), the negotiator will note the information in the comments screen of QDS Subscriber Inquiry. (a new CPNI PSSW comment code will be added)

**Example:** AA CPNI Password stated by Fred  
AAA CPNI Security question answered correctly by Fred

*\*The immediate documentation of a confirmed or a rejected "Authentication" will create a "time stamp" within the Comments screen of when and who we spoke with. This will be of great importance in the event we are ever questioned if the appropriate course of action was performed during any of our customer contacts.*

## ***CPNI Authorization Statement: DOCC – “Duration of Call Consent”***

**Duration of Call Consent (Per Call) Statement** or “DOCC” statement is required to obtain a customer’s CPNI, to discuss CPE/non-telecommunication services, and/or Telecommunications services in another “bucket” in which the customer does not subscribe. The account information belongs to the customer so the DOCC statement **MUST** include these key elements:

- 1) Ask permission to review records
- 2) State reason why ( to possibly make a sales recommendation)

Examples of acceptable Authorization statements include:

- “May I have your name and telephone number, and your permission to access your account and check your service options?”
- “May I have your permission to access your account so I can help you with your request and tell you about our available services?”
- “May I review your account so I can tell you about other features Pine Tree is offering?”
- “May I review your records to see what other Pine Tree Networks services might help you, or you might be interested in?”
- “May I review your records in order to assist you with your inquiry, and also see if there are other services which may help you?”
- “May I have your permission to review your account records, for the purpose of offering additional service options?”

Duration of Call Consent (DOCC) allows Pine Tree Networks to use a customer’s CPNI for only the duration of that inbound call. It does not provide Pine Tree Networks the opportunity to use the customer’s CPNI in the future without asking each time for their consent. (Long-Term consent where the DOCC is not needed is considered “General consent” or Opt-In)

### **Documentation of CPNI Authorization (DOCC) in QDS-**

**Document DOCC approval in QDS-** After the DOCC statement has been provided, and the customer’s permission has been obtained to use their CPNI, the negotiator will note the information in the comments screen of QDS Subscriber Inquiry. (a new CPNI DOCC Approved comment code will be added)

**Example: AB CPNI DOCC Approved by Fred**

### **Documentation of CPNI Authorization (DOCC) Refusal in QDS-**

**Document DOCC refusal in QDS-** After the DOCC statement has been provided, and the customer has REFUSED to allow us the use of their CPNI, the negotiator will note the information in the comments screen of QDS Subscriber Inquiry. (a new CPNI DOCC Refused comment code will be added)

**Example: ABB CPNI DOCC Refused by Fred**

\*if the customer refuses the DOCC authorization, negotiators may **ONLY** discuss the specific product or service requested by the customer, within their current usage bucket. **NO** other “out of bucket” service is to be offered. \*unless the customer specifically requests a service.

**DOCC Refusal Contact Documentation in QDS-** Included in the **ABB – CPNI Refusal** comment, the negotiator must include a detailed description of the course of action that was taken, what was requested, and by whom .

*\*The documentation sequence of a confirmed or a rejected “Authorization” will create a “time stamp” within the Comments screen of when and who gave us permission to offer the services contained in the order. The “Authorization” comment is required to be entered prior to the creation of the order. This will be of great importance in the event we are ever questioned if the appropriate course of action was performed during any of our customer contacts.*

**If the caller is a new customer-** New customers to Pine Tree Networks (not an existing Pine Tree Networks customer requesting additional service) do not require a “DOCC” “Consent statement” to sell any Pine Tree Networks service or products. Upon the creation of the new account, we will now be required to establish an account password, and select a secondary “non-biographical” security question.

**CPNI is not required if offering services directly related to the customer’s existing service relationship-**

Any carrier may market and/or sell telecommunication services directly related to the customer’s current service relationship (i.e. same bucket.) This means that if Pine Tree Networks is currently providing local service to a customer, we may use CPNI (without customer consent) to sell/offer any additional in the “local service bucket.” This includes services such as: Custom Calling Features, listings, additional lines, toll, etc.

**If the caller specifically requests “out of bucket” services,**

A DOCC statement is not required when a customer specifically asks for or inquires about an “out of bucket service.” However, CPNI may only be used for that specific product or service requested by the customer. If any other “out of bucket” service is to be offered, then the negotiator must use the DOCC statement and obtain the customer’s approval to continue. A Comment must be entered in QDS subscriber Inquiry that explains the course of action that was taken and when.

**Document Customer initiated “out of bucket” requests in QDS-** Although the DOCC is not required, it is necessary to document customer initiated requests for “out of bucket” services. The negotiator will note the information in the comments screen of QDS Subscriber Inquiry. (a new CPNI DOCCNA comment code will be added)

**Example: ABC CPNI DOCC N/A request for PTN LD initiated by Fred**

**\*\*The FCC requires that Pine Tree Networks maintain a “retrievable” 1-year record of these notations as to ensure CPNI compliance. All negotiators are required to leave a detailed comment on All accessed QDS accounts.**

## ***Reception area and In-Office Customer Contacts:***

### **“In-Office” Customer Service contacts**

In-office customer service allows authentication through the presentment of a valid Photo ID prior to the disclosure of CPNI. (Photo ID must be Government Issued) A redesign of the office reception area may be required as to ensure there is proper distance between the customers being serviced, and the customers waiting in line when CPNI is being discussed. In addition to limiting the possibility of eavesdropping, Receptionists must take proper security measures to protect the indirect viewing of their customer’s CPNI on their computer monitors or printed transaction receipts.

### **Documentation of In-Office customer account Authentication in QDS**

**Document the ID presentment and authentication approval in QDS-** After the customer has provided a Government issued photo ID, and appropriate authentication has been determined, the negotiator will note the information in the comments screen of QDS Subscriber Inquiry. (a new CPNI PSSW comment code will be added)

**Example: AAAA CPNI ME Lic presented by Fred**

### **Documentation of In-Office customer account payment in QDS**

In-office customer payments are required to be documented in the comments screen of QDS Subscriber Inquiry. Following customer Authentication, the negotiator will document the payment transaction.

**Example: CONT In-Office payment made by Fred**

### **Documentation of “drop off” customer account payments/correspondence in QDS**

“Drop-off” payments/correspondence are required to be documented in the comments screen of QDS Subscriber Inquiry. Following customer Authentication, the negotiator will document the payment transaction.

**Example: CONT Drop-off payment received**

### **Individual duty to protect CPNI**

The protection of CPNI carries over to every representatives’ work station. We are required to follow the correct shredding practices/recycling procedures outlined within our Pine Tree Networks Privacy Policy. This policy in general requires, that after internal use, we destroy all credit card/payment information, account service records/statements, printed service orders and anything containing a customer’s personal data. In addition to adhering to the required shredding practices, representatives must take proper security measures to protect the indirect viewing of their customer’s CPNI on their computer monitors. The Windows security feature will allow the representative to “lock” their computers prior to leaving their work station for any extended time. To regain system access, the representatives will then be required to enter their “sign on password.”

## ***CPNI Protection for Online Account Access (EBPP):***

### **CPNI protection for Online Account Access (EBPP)**

The Order requires password-protection for online access to CPNI. Because we are prohibited from relying on "readily available biographical information" or "account information" to authenticate a customer's identity before a customer accesses their EBPP (Electronic Bill Pay and Presentment) account, this significantly limits the customer's ability to self-register for EBPP, and our on-line authentication options.

### **Existing customers with established EBPP accounts and passwords:**

Customers will be allowed to continue to utilize their existing passwords and should experience no problems in completing routine transactions.

### **Existing customers aspiring to self-register or initialize on-line access to EBPP:**

Customers will reach the new account registration screen of our site, and be directed to contact a Customer Service Representative at their local business office to complete the registration. The representative receiving the customer's request to register will need to follow the FCC's proposed means of authentication—calling a customer at the telephone number of record or confirming the embedded statement CPIN. Once the customer has been authenticated, the CSR will ask the customer to establish a CPNI/On-Line password and back-up authentication question. The customer will now be able to sign up on-line for EBPP.

### **New customers without established EBPP accounts or passwords:**

Customers will upon new-install both create a password and select a back-up security question. This will allow the customer to sign up for EBPP.

Quintrex Data Systems Corp.: Forgot Password - Windows Internet Explorer

http://www.quintrex.com/demo/qds/ebpp/app/ForgotPassword.asp

Google

Quintrex Data Systems Corp.: Forgot Password

Home | Log In | Contact Us | Privacy Policy

Please enter the following required information in order for your forgotten password to be emailed:

Account Number:

Security Question: *Favorite Sport*

Security Answer:

[Back To Login](#)

Home | Log In | Contact Us | Privacy Policy

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Done Internet 100%

## QDS Procedures for New Install

- To adequately load CPNI information into QDS, (create a “live” file) we are required to enter the order as a Virtual Install.
- On the Main Form, click the Virtual Install box.

Session ID 3348 Add 01 Service Order # 351855 - [Main Form]

0002 (207) 428-4108 MARY POST  
Account No 172961 SO Type: 01

351855 01 - INSTALL  
(207) 428-4108 MARY POST

Received Date: 11/29/2007 Time: 9:26 AM By: MPOST  
Due Date: 11/29/2007 Time: 5:30 AM By: Comments: TEST

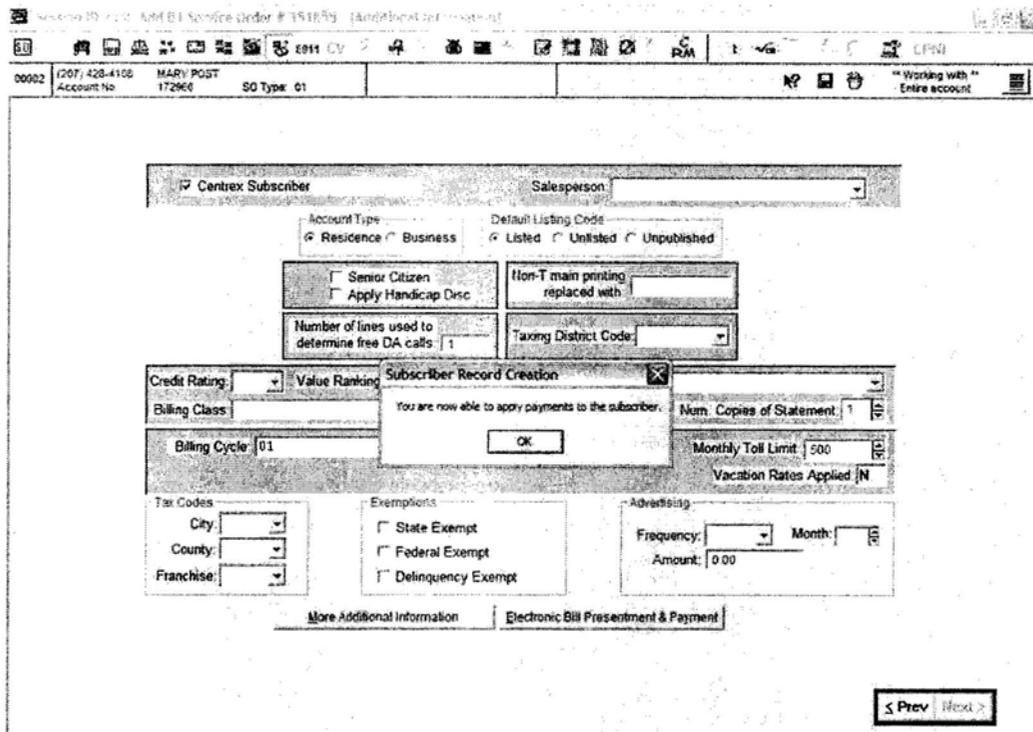
Priority: 1 (High) to 8 (Low)  1  2  3  4  5  6  7  8

Contact Information: Contact Name, Contact Telephone: (207) 428-4108

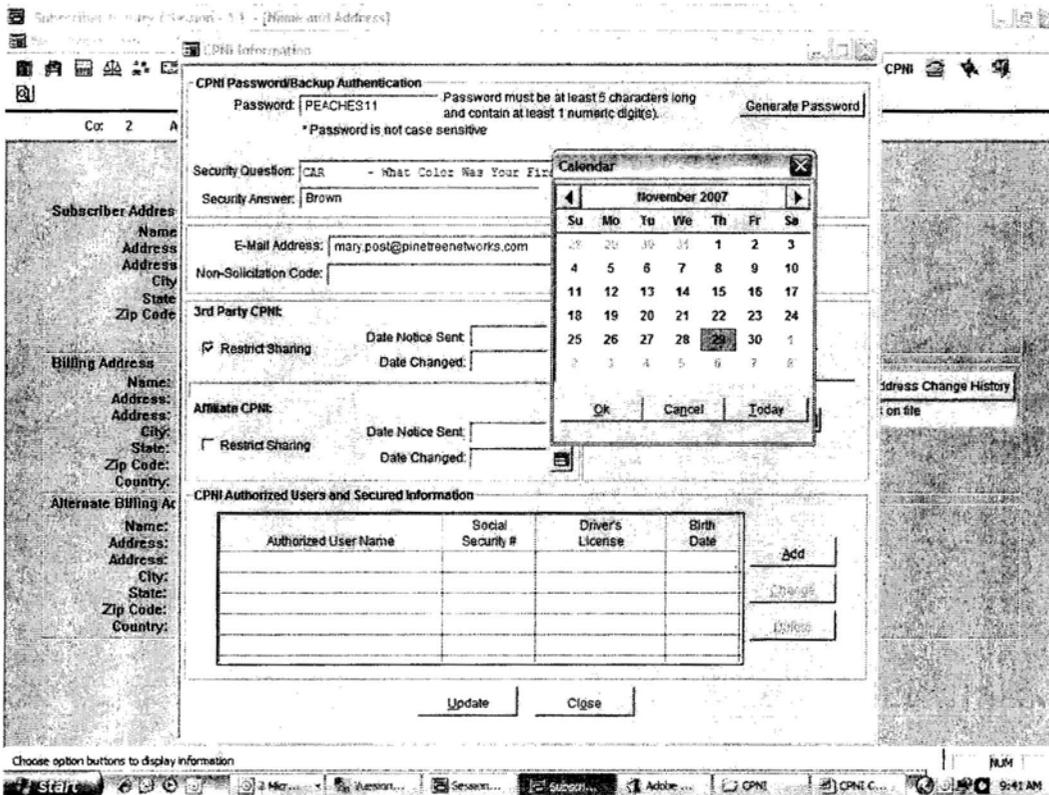
Virtual Install:  Create Subscriber Prior To Save

Next

After clicking “Next” on the Additional Information Screen, the following pop-up box will appear. Click OK, and the CPNI icon will become active. Click on CPNI.



## The CPNI Screen



3<sup>rd</sup> Party CPNI is selected as a default on ALL live customer accounts. Pine Tree Networks at present does not have any 3<sup>rd</sup> party agreements to share customer information.

Affiliate sharing of CPNI can be restricted at the customer's request by responding "affirmatively" to the terms of the CPNI Opt-out letter. The Opt-out letter directs the customer to contact the business office for customer service or dial into the "Opt-out line" (207) 929-7878 to initiate the "restrict sharing" request. We will be including the Opt-out letter in every Welcome kit for our new customers, and sending the Opt-out letter every two years to our existing customer. QDS has designed a time tickler to allow us to see when any changes have been made, and on what date the Opt-Out notice was mailed. The FCC has mandated that we maintain a file of these CPNI restriction requests, account changes, and Notice mailings.

When mailing a Welcome Kit, standard procedure requires a notation in the comments section. With the addition of the Opt-Out letters to the kit, we will also need to update the CPNI screen as to when the letter was sent. You may type in the date (mm/dd/yyyy) Or Click on the "Display Calendar" button in the "Date Notice Sent" field of the Affiliate CPNI section to select your date. Once the date is entered, click the Update button and close out the screen. The process must be noted in the Comments section as follows:

**Example: WELC Welcome kit + Opt-out letter included**

### ***Notification Process in the event of a CPNI breach:***

In the event of a CPNI breach, the FCC CPNI Order mandates the notification of both law enforcement and the affected customers within a designated time frame.

Carriers are required to report CPNI breaches to law enforcement no later than seven business days after a "reasonable determination of a breach," by sending notification through a central reporting facility to the U.S. Secret Service "USSS" and the Federal Bureau of Investigation "FBI"

The disclosure of CPNI breaches to the affected customers are permissible seven days after notification to the USSS and the FBI, providing the law enforcement authorities have not requested continued postponement of the disclosure. If it is determined that there is an "urgent" need for customer notification of the breach as to avoid "immediate and irreparable harm," we must first consult with the relevant investigative agency, and upon receiving their consent, we may send notification of the breach to the affected customer.

Any employee in violation of the CPNI Order, or any employee having knowledge of a violation of the CPNI Order policy shall promptly report such violation to the appropriate level of management. Senior management (Director Level) of Pine Tree Networks will be responsible for maintaining proper Notification compliance and informing the required divisions of law enforcement through a central reporting facility. The Commission will maintain a link to the reporting facility at <http://www.fcc.gov/eb/cpni>.

**All Carriers are required to maintain for TWO Years, a record of the following:**

- **The date that the CPNI breach was discovered**
- **The date notification was sent to the USSS and the FBI**
- **The USSS and FBI response**
- **A detailed description of the CPNI that was breached and the circumstances of the breach**

*\*Employees who are unsure whether specific information is CPNI, or are in need of assistance with a specific customer contact should ask their Team Leads, or direct Supervisor for procedural clarification.*

**All consumer complaints must be investigated and documented**

Any accusation or complaint of unauthorized CPNI disclosure must be reported to the appropriate level of management, and documented in the comments screen of QDS Subscriber Inquiry. **A summary of all consumer complaints received within the year (December 8, 2007- March 1, 2008) regarding the unauthorized release of CPNI, is required to accompany our annual March 1<sup>st</sup> certification. This includes :**

- **The number of complaints broken down by category (e.g., improper access by employees, by unauthorized individuals, or online)**
- **Information regarding “pretexter” tactics and carriers’ protective steps taken.**

***Notification Process for Account Changes:***

The FCC Order requires that we notify customers immediately when

- (a) the customer’s password has been changed
- (b) customer’s response to a “back-up security question” has been changed
- (c) online account has been created or changed
- (d) address of record has been created or changed

Notification may be sent via voicemail, text message, or an e-mail/letter to the telephone number or address of record. (the notification must NOT reveal the changed account information) QDS has designed a program that will automatically generate a “Notification of Account Changes” spread sheet for any customers with such account changes. (See Appendix for sample Notification letters) We will be required to pull the list on a daily basis and run the mail merge to issue the letters. Files of the spread sheets will be maintained for proof of Notification Process compliance.

*Business Customer Exemption.* The Order dictates that “Telecommunications carriers may bind themselves contractually to authentication regimes other than those described in this section for services they provide to their business customers that have both a dedicated account representative and a contract that specifically addresses the carriers’ protection of CPNI.” Thus, we are required to notify our business customers only when contractually obligated to do so.

# **COMMON INFORMATION & ASSISTANCE FOR CUSTOMERS**

## **Helpful Answers to common questions**

### **What is CPNI?**

- Customer proprietary network information (CPNI) is all of your phone calling data, including the services you subscribe to, whom you call, when you call, how long your calls are, etc.
- CPNI applies to personal accounts and some business accounts.

### **Why am I being asked to give a password/show an ID?**

The Federal Communications Commission adopted a new Order intended to take stronger security measures in the protection of your personal information. With the increase of crimes such as identity theft, and pre-texting/data brokerage, the Commission felt it was their duty to bring forth protection standards relative the needs of today's technology.

### **Can I call another phone company to avoid these password requirements?**

No, all phone companies (wireless to wireline/VOIP) must comply with the FCC's Order.

### **What is this FCC Order going to require me to do?**

Minimum requirements:

- Account passwords must be authenticated before any CPNI information is provided. Government issued ID's are considered acceptable forms of identification validation.
- If you forget your password, you will have the option to authenticate your authorization by a "back up security question" derived from non-biographical information.
- If you forget your password and cannot give the correct answer to the security question, the FCC Order requires us to call you back at your account telephone number,

### **Why can't you use my Date of birth/maiden name/SS#?**

There has been a huge increase in the number of identity theft and pre-texting crimes being committed in the United States. These crimes are typically achieved by acquiring "readily available biographical information." This is information drawn from the victim's life history such as a social security number, or the last four digits of that number, mother's maiden name, home address, date of birth, etc. Because of their common usage in personal accounts and documents, (i.e. bank records, insurance policies, court records, on-line money accounts etc.) the FCC is requesting that we use "less common" information to strengthen CPNI protection measures.

### **Do I always have to say a password or show my ID?**

*There are some exceptions to the password rule.*

- You won't need a password to call in and get help with specific charges or service issues that you can give sufficient detail of. (i.e. date, time, number and length of a questioned call on the bill)
- Telephone records/account information can be requested to be mailed to your address of record, given over the phone at the number of record, or given in person with the presentment of a Government issued photo ID at an office reception area. (no password required)
- **For online access to your account, a password is mandatory.**

### **Can the Police obtain my phone records?**

Law enforcement agencies, such as the police or the FBI, can lawfully obtain your phone records as long as they provide a subpoena or a court order to do so.

### **Why did I get this letter in the mail about my address change?**

The FCC Order requires all carriers to notify customers of any changes to the following:

- Password/security question answers changes
- Billing address changes
- Account holder responsibility changes
- If CPNI information is released without your permission (breach)

### **What does this FCC order require phone companies to do?**

Phone companies must follow certain laws and abide by FCC rules:

- Keep records of customer permission to use account information for marketing purposes. (notes on accounts)
- Monitor and record events in which customer information was disclosed to third parties.
- Train employees in the appropriate use of customer information.
- Review marketing efforts to ensure privacy requirements.
- Prepare and make publicly available annual certificates that the company has established operating procedures to comply with FCC rules.
- Inform the FCC of any actions taken against pre-texters/data brokers.
- Provide a summary of the customer complaints about unauthorized disclosure of customer information annually.

### **What can I do if my phone records have been stolen?**

- Contact a Pine Tree Networks representative to change your account password and to submit notification to the appropriate FBI and USSS departments.
- If not a breach situation, an incident report can be filed with your local law enforcement agency.

**Who should I complain to if my phone information is disclosed without my permission? (BREACH)**

- If you think your customer information has been disclosed without your permission (breach), contact a Pine Tree Networks representative immediately. PTN will submit the breach information to the appropriate FBI and USSS departments as required by the FCC CPNI Order.
- The PTN representative is required to document any complaint regarding the unauthorized disclosure of CPNI, and submits it along with PTN's annual CPNI certification statement.
- **Customer initiated complaints can be filed with the FCC:** Email: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov); Online: [www.fcc.gov/cgb/complaints.html](http://www.fcc.gov/cgb/complaints.html); Phone (voice): 888-CALL-FCC (888-225-5322); Phone (TTY): 888-TELL-FCC (888-835-5322); Fax: 866-418-0232; Mail: Federal Communications Commission, Consumer & Governmental Affairs Bureau, Consumer Complaints, 445 12<sup>th</sup> Street, SW, Washington, DC 20554.

***Suggestions for customers to further guard their information.***

**You can ask Pine Tree Networks to:**

- Deactivate the online access feature if you don't manage your account online.
- Change your telephone number, and request non-published service.
- Set up a non-biographical password for telephone account access.

## SCENARIOS

### *Activity Sheets*

Determine if it is safe to provide information.

1. A Customer calls in to request the detail on some calls on their bill. They do not have a copy of the bill in front of them, but they know there are “a lot of calls to a number in Bar Mills.” They state the correct name on the account, but “cannot remember their password,” and gave the wrong answer to their back-up security question. What would you do?

- a. Provide only the information for the Bar Mills calls?
- b. Provide no information and tell the customer that they need to call back when they have the password?
- c. Provide no information during the contact, but offer to either call the billing number and leave a message, or send an e-mail to the address on record that explains call detail?

WHY:

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2. A Customer calls in to request the detail on some calls to Bar Mills on their bill. They have a copy of the bill right in front of them, and can specifically name the time, date and duration of the calls they are inquiring about. They state the correct name on the account, but “cannot remember their password,” and gave the wrong answer to their back-up security question. What would you do? (the CPIN has been removed)

- a. Provide only the information for the Bar Mills calls?
- b. Provide no information and tell the customer that they need to call back when they have the password?
- c. Provide no information during the contact, but offer to either call the billing number and leave a message, or send an e-mail to the address on record that explains call detail?

WHY:

---

3. A customer calls in to you and claims to be the newly designated power of attorney for his neighbor Fred Smith’s account. He gave the correct password, but there is no information about him anywhere in the comments. He is requesting to remove Clearly Complete, and leave only the dial tone with Economy service on the line.

What do you do?

- a. Carry out the order request, making sure to note the new information in comments?
- b. Advise the caller that before you can begin any order that they will need to fax you the POA paperwork. Once paperwork is received, you will attach the document to the account in QDS, add the caller’s information in comments, and execute the order?
- c. Advise the caller that you will need to call them back at the telephone number on record to verify that this request is legitimate before you can issue the order?

WHY:

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4. A customer calls in and requests a copy of “her husband’s bill” to be mailed to their Florida address. She gave the correct password, but there is no information about her, or a Florida address anywhere in the comments. (She does not want to change the mailing address on the account)

What do you do?

- a. Carry out the request, making sure to note the new information in comments?
- b. Advise the caller that you are only able to send a copy of the bill to either the service address, or the e-mail address on record?
- c. Advise the caller that you will need to call her back at the telephone number on record to verify that this request is legitimate before you can mail out a copy of the bill?

WHY: \_\_\_\_\_

5. A customer calls in and requests to make a payment on his daughter’s account. He was listed in Comments as an AOP prior to the new CPNI rule implementation, but cannot verify the new password on the account or give the correct answer to the back-up security question.

What do you do?

- a. Advise the caller that due to the new CPNI rules, you cannot take his payment unless you can call him back at the billing telephone number?
- b. Advise the caller that because he doesn’t have any of the passwords, you can accept a payment from him, but you cannot tell him the balance due, or any other account information?
- c. Advise the caller that because he doesn't have the password, you will attempt to call his daughter to get her permission to accept a one time payment. Upon speaking with the daughter, you advise her to share the password with those persons she wishes to have authorization on her account?

WHY: \_\_\_\_\_

6. A customer called in to you, gave the correct billing name, and stated the correct account password. You note the account of the authentication, and ask for his authorization to access his account to offer other PTN services. His answer is “no.” He requests to remove the call waiting on his line and states that “he wishes there was a way people could just leave him a message while he was on the phone, so he wouldn’t have to put anyone on hold.” The customer presently has premium service, call waiting, Wire Maintenance, and a teen line. What do you do?

- a. Carry out the order request, making sure to leave your authentication and authorization comments in the correct sequence?
- b. Offer Voice Mail to the customer because he has an established business relationship with Pine Tree Networks?
- c. Carry out the order request to remove the call waiting, making sure to leave appropriate comments on the account, and send the customer a Voice Mail brochure in the mail to his address of record, noting the account of his expressed interest in the product?

WHY: \_\_\_\_\_

7. A customer called in to you, gave the correct billing name, and stated the correct account password. You note the account of the authentication, and ask for her authorization to access her account to offer other PTN services. Her answer is “no.” She requests to remove the call waiting on her line and states that “she wishes there was a way people could just leave her a message while he was on the phone, so she wouldn’t have to put anyone on hold.” She then says “don’t you have some sort of Answering service that can do that?” The customer presently has premium service, call waiting, Wire Maintenance, and a teen line. What do you do?

a. Advise the customer that you would like to answer her question, but since she declined to give you authorization to offer PTN services, you are not permitted to do so. You then carry out the order request, making sure to leave your authentication and authorization comments in the correct sequence?

b. Offer Voice Mail to the customer because although she refused Authorization, she specifically asked to discuss that particular service. Then noting the account that she refused Authorization but specifically requested Voice Mail?

c. Carry out the order request to remove the call waiting, making sure to leave appropriate comments on the account, and send the customer a Voice Mail brochure in the mail to his address of record, noting the account of her expressed interest in the product?

WHY: \_\_\_\_\_

***Four Things for CSRs to Remember:***

1. Authenticate every customer, and when necessary, get account Authorization prior to discussing products or services.
2. Authenticate every customer, and when necessary, get account Authorization prior to discussing products or services.
3. Authenticate every customer, and when necessary, get account Authorization prior to discussing products or services.
4. Authenticate every customer, and when necessary, get account Authorization prior to discussing products or services.

**!!!!AUTHENTICATE AND GET AUTHORIZATION!!!!**

**\*\*\*\*\*Quick Reference\*\*\*\*\***

**AA = CPNI Password confirmed**

**AAA= CPNI Security question answered**

**AAAA=CPNI Photo ID presented**

**AB= CPNI Authorized DOCC statement**

**ABB= CPNI Refused DOCC statement**

**ABC= CPNI N/A DOCC statement**

**CPIN= Pin Number for CPNI authentication on statements**

**WELC= Welcome Kit Mailed**

**APPENDIX 1**  
**SAMPLE CHANGE OF ACCOUNT RESPONSIBILITY LETTER**

Telephone Number: XXX-XXX-1234

Dear Customer,

Account Holder responsibility has been changed for the Telephone number listed above.

An Account Holder has full account management authorization including but not limited to the viewing and paying of the monthly statement, as well as various other service and equipment related changes.

If you did not request this change, please contact us immediately at 1-866-PINE-TREE (866-746-3873).

Thank you for your immediate attention to this matter.  
Pine Tree Networks

**APPENDIX 2**  
**SAMPLE CHANGE OF EBPP ACCOUNT PASSWORD**

Telephone Number: XXX-XXX-1234

Dear Customer,

The On-line account password for the Telephone number listed above was changed on 12/9/2007.

Your security is important to us. If you are unaware of this action, please contact us immediately at 1-866-PINE-TREE (866-746-3873).

Thank you for your immediate attention to this matter.  
Pine Tree Networks

**APPENDIX 3**  
**SAMPLE CHANGE ACCOUNT PASSWORD**

Telephone Number: XXX-XXX-1234

Dear Customer,

The account authorization password for the Telephone number listed above was changed on 12/9/2007.

Your security is important to us. If you are unaware of this action, please contact us immediately at 1-866-PINE-TREE (866-746-3873).

Thank you for your immediate attention to this matter.  
Pine Tree Networks

**APPENDIX 4**  
**SAMPLE CHANGE OF CHANGE OF ADDRESS**

Telephone Number: XXX-XXX-1234

Dear Customer,

The On-line account password for the Telephone number listed above was changed on 12/9/2007.

Your security is important to us. If you are unaware of this action, please contact us immediately at 1-866-PINE-TREE (866-746-3873).

Thank you for your immediate attention to this matter.  
Pine Tree Networks

**APPENDIX 5**  
**Employee Verification of Review of Manual**

Employee Name:

Date:

I have reviewed the Company's Customer Proprietary Network Information Compliance Manual and Operating Procedures and agree to comply with the procedures set forth therein.

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Employee Signature

**APPENDIX 6**  
**Annual Corporate Officer Certification Form**

December 8, 2007

**Annual Certification Letter- Customer Proprietary Network  
Information Procedures of Pine Tree Networks**

I, <Name of Company Officer> hereby certify that I have personal knowledge that Pine Tree Networks has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Pine Tree Networks. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: \_\_\_\_\_

By: < Name and Title of Company Officer >

**APPENDIX 7**  
**Annual Corporate Officer Certification Form**

December 8, 2007

**Annual Certification Letter- Customer Proprietary Network  
Information Procedures of Pine Tree Networks**

I, <Name of Company Officer> hereby certify that I have personal knowledge that Pine Tree Networks has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Pine Tree Networks. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: \_\_\_\_\_

By: < Name and Title of Company Officer >