

Training Material

CPNI

What is CPNI?

- Information regarding to whom, where, and when a Customer places a call.
- Frequency, timing, and duration of calls.
- The types of service offerings to which the Customer subscribes.

CPNI is Not...

- ⦿ Subscriber List Information.
- ⦿ Customer name, address and phone number.

Company Obligations

- Protect the confidentiality of its Customers.
- Disclose CPNI, upon affirmative written request by the Customer, to any person designated by the Customer.
- Maintain records of approval, whether oral, written or electronic, for at least one year.
- Customer notification must provide sufficient information to enable the Customer to make an informed decision whether to permit a Carrier to use CPNI.
- The Company's personnel must obtain supervisory approval regarding any proposed use of CPNI.
- Training of Company personnel will include review of this Manual by all new employees and all existing employees who have not previously done so.

Company obligations (cont'd)

- The Company may, without Customer approval, use CPNI to market services such as new telephone features.
- When the Company receives or obtains CPNI by virtue of its provision of a Telecommunications Service, it can only use, disclose, or permit access to individually identifiable CPNI in its provision of:
 - The Telecommunications Service from which the information is derived; or
 - Services necessary to, or used in, the provision of the Telecommunications Service, including the publishing of directories.

Prohibitions

- Use, disclose or permit access to CPNI to identify or track Customers that call competing service providers.
- The Company may not use, disclose, or permit access to CPNI to market service offerings to a Customer that are within a category of service to which the Customer does not already subscribe from the Company.
- Company is not permitted to share CPNI with its Affiliates, except with the Customer's approval.

How to get customer's approval

- ① Written method (letter/form)
- ① Oral method (call recording)
- ① Electronic method (internet form)

Ask you supervisor for forms and instructions

Getting Customer's approval

- The Company must notify the Customer of the Customer's right to restrict use of, disclosure of, and access to, the Customer's CPNI.
- Customer notification must provide sufficient information to enable the Customer to make an informed decision whether to permit a Carrier to use CPNI.
- Specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the Customer of the right to disapprove those uses, and deny or withdraw access to CPNI at any time.

- Advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the Customer subscribes.
- State that the Customer has a right, and the Company has a duty, under federal law, to protect the confidentiality of CPNI.
- Be comprehensible and not misleading.

Customer approval NOT required.

- To provide inside wiring installation, maintenance, and repair services.
- For the provision of Customer Equipment and features.
- To protect the rights or property of the Company.
- Initiate, render, bill and collect for Telecommunications Services.
- To respond to the user's call for Emergency Services.

In case of improper use

- Any improper use of CPNI will result in appropriate disciplinary action in accordance with established Company disciplinary policies.
- Any improper use shall be treated as a serious offense, and may result in suspension or termination of employment in appropriate case.