

# CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) POLICY

## CPNI PROTECTIONS

As a customer of Franklin Telephone services, you have the right, and Franklin Telephone has a duty, under federal law, to protect the confidentiality of certain types of telecommunications data, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of telecommunications services, and (2) information contained on your telephone bill concerning the services that you receive. This information is known as "Customer Proprietary Network Information" or "CPNI". CPNI does not include your customer name, address or telephone number, nor does it include Internet Access Services or Video Services information.

## CUSTOMER APPROVAL

From time to time, Franklin Telephone would like to use the CPNI information it has on file to provide you with information about Franklin Telephone's communications-related products and services or special promotions. Franklin Telephone's use of CPNI may also enhance its ability to offer products and services tailored to your specific needs. To that end, Franklin Telephone would like your approval so that Franklin Telephone may use this CPNI to let you know about communications-related services other than those to which you currently subscribe and that Franklin Telephone believes may be of interest to you. **IF YOU APPROVE, YOU DO NOT HAVE TO TAKE ANY ACTION.**

However, you do have the right to restrict our use of your CPNI. **YOU MAY DENY OR WITHDRAW FRANKLIN TELEPHONE'S RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING (877)-422-1212 OR COMPLETING THE WITHDRAW FORM ON OUR WEBSITE.** If you deny or restrict your approval for Franklin Telephone to use your CPNI, you will suffer no effect, now or in the future, on how Franklin Telephone provides the services to which you subscribe. Any denial or restriction of your approval remains valid until your services are discontinued or you affirmatively revoke or limit such approval or denial.

In some instances, Franklin Telephone will want to share your CPNI with its independent contractors and joint venture partners, if any, in order to provide you with information about Franklin Telephone's communications-related products and services or special promotions. Prior to sharing your CPNI with its independent contractors or joint venture partners, **FRANKLIN TELEPHONE WILL OBTAIN PRIOR WRITTEN PERMISSION FROM YOU.**

## CUSTOMER AUTHENTICATION

Federal privacy rules require Franklin Telephone to authenticate the identity of its customer prior to disclosing CPNI. Customers calling Franklin Telephone's customer service center can discuss their services and billings with an Franklin Telephone representative once that representative has verified the caller's identity. There are three methods by which Franklin Telephone will conduct customer authentication:

- 1) by having the Customer provide a pre-established password and/or PIN;
- 2) by calling the Customer back at the telephone number associated with the services purchased;  
or
- 3) by mailing the requested documents to the Customer's address of record.

Passwords and/or PINs may not be any portion of the Customer's social security number, mother's maiden name, amount or telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password and/or PIN, Franklin Telephone will ask the Customer a series of questions known only to the Customer and Franklin Telephone in order to authenticate the Customer. In such an instance, the Customer will then establish a new password/PIN associated with their account.

## **NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES**

Franklin Telephone will notify customers of certain account changes. Whenever an online account is created or changed, or a password or other form of authentication (such as a “secret question and answer”) is created or changed, Franklin Telephone will notify the account holder by either the email address that they provided or by mailing the notification to the address of record. Additionally, after an account has been established, when a customer’s address (whether postal or e-mail) changes or is added to an account, Franklin Telephone will also send an Account Change Notification.

## **DISCLOSURE OF CPNI**

Franklin Telephone may disclose CPNI in the following circumstances:

- When the Customer has approved the use of their CPNI for Franklin Telephone or Franklin Telephone’s joint venture partners and independent contractors (as the case may be) sales or marketing purposes.
  
- When disclosure is required by law or court order.
  
- To protect the rights and property of Franklin Telephone or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services.
  
- When a carrier requests to know whether a Customer has a preferred interexchange carrier (PIC) freeze on their account.
  
- For directory listing services.
  
- To provide the services to the Customer, including assisting the Customer with troubles associated with their services.
  
- To bill the Customer for services.

## **PROTECTING CPNI**

Franklin Telephone uses numerous methods to protect your CPNI. All Franklin Telephone employees are trained on how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by an Franklin Telephone supervisory committee to ensure that all such campaigns comply with applicable federal CPNI rules.

Franklin Telephone maintains records of all sales and marketing campaigns that utilize Customer CPNI. Included in these records is a description of the specific CPNI used. Franklin Telephone maintains records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

Franklin Telephone will not release CPNI during customer-initiated telephone contact without first authenticating the Customer’s identity in the manner set-forth herein. Violation of this CPNI policy by any Franklin Telephone employee will result in disciplinary action against that employee as set-forth in Franklin Telephone’s Policy Manual.

## **BREACH OF CPNI PRIVACY**

In the event Franklin Telephone experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require Franklin Telephone to report such breaches to law enforcement. Specifically, Franklin Telephone will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility can be found at: <https://www.cpnireporting.gov> . Franklin Telephone cannot inform its Customers of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, Franklin Telephone is required to maintain records of any discovered breaches, the date that Franklin Telephone discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances

of the breach, and law enforcement's response (if any) to the reported breach. Franklin Telephone will retain these records for a period of no less than two (2) years.

#### **NOTIFICATION OF CHANGES TO THIS POLICY**

If Franklin Telephone makes modifications to this CPNI Policy, we will post those changes on <http://www.ftcweb.net> or in other places that we deem appropriate. Our desire is keep you updated as to what information we collect, how we use it, and under what circumstances, if any, we disclose it. If you decide to continue receiving your services after we make any changes to this the CPNI Policy, you shall be deemed to have given your consent to the changes in the revised policy.