

CPNI Protocol Manual

Customer Proprietary Network Information

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What is CPNI?

Both the Communications Act and the Commission's rules require telecommunications carriers, and interconnected providers of Voice over Internet Protocol (VoIP) services, to protect "customer proprietary network information," or CPNI.

CPNI is information that all telecommunications companies, collect about the voice phone services and/or interconnected voice over Internet protocol (VoIP) services you purchase from us, and how you use them. ... You have the right to deny or withdraw authorization of this use of your CPNI.

Why is CPNI important?

CPNI plays an important role in promoting competition for telecommunications services and for services that require access to the underlying telecommunications network. Rather, these rules prohibit telecommunications providers from taking advantage of their position as a two-sided platform.

What does CPNI include?

CPNI includes some of the most sensitive personal information that carriers and providers have about their customers as a result of their business relationship (e.g., phone numbers called; the frequency, duration, and timing of such calls; and any services purchased by the consumer, such as call waiting).

What is protected under CPNI?

The Telecommunications Act of 1996 protects the privacy of "CPNI" — phone numbers dialed, date and time of calls — but this safeguard does not cover internet-based calls. EPIC told Congress that CPNI privacy rules should apply to both telecommunications companies and Internet firms. For example, information about a customer's use of a broadband data network, including web browsing history or app data, is not CPNI under the current rules. However, the FCC can still impose similar rules on non-telecommunications carriers under its ancillary authority.

How to open new accounts.

In order to open a new account with Autophone of Laredo the call or sales transaction must be fulfilled by our Customer Service and/or Sales Representative(s). These representatives must request the following forms or information from customers.

- Sales order form
- Internet Service order form
- Application for service
- Current valid form of ID
- Credit Card Authorization form
- Height Acknowledgement form
- Contract
- Covid19 Acknowledgement form

The following forms must be filled out by our authorized representative(s) only:

- Sales order form
- Internet service order form
- Contract

All forms must be read by customer and have printed customer name and signature. These forms must all be turned into our office completed. The authorized representative(s) must then create a new customer folder and file accordingly in our administration office. Once all these procedures are done Representative(s) can schedule installation(s) of service(s).

How to verify accounts.

Account verification must be made ONLY by our Customer Service and our Billing Representatives. The account holder or any of its representatives will have to verify this PIN Number in order to make any type of changes on the account. The PIN Number will also have to be verified if any information that is proprietary is requested by the account holder or its representatives. The PIN Number will be located under the customer's account information in our Quick Books system.

How to handle incoming calls.

All incoming calls are to be handled by our customer service representative(s) from here on out referred to as rep(s). Our rep(s) must take calls and investigate the matter at hand from caller. If caller is requesting technical support, all support can and may be provided without verifying the account in any way. The rep must ensure call is resolved and attended to in a timely matter by any means necessary including but not limited to transferring call to any other technical support agent, field engineer, and/or manager.

Should the call turn into a call where information is being requested about the account, the rep(s) must verify the account via pin number provided by account owner. If call is under care by our technical staff they must transfer call back to a customer service rep for account verification.

If the account is verified rep(s) must request caller to submit request in writing if such request requires change of information in way that it may affect the following:

- Billing changes such as but no limited to (package changes, pricing changes, password changes, etc.)
- Account responsibility such as but no limited to (Name change, persons responsible to receive private information, pin changes, email password(s) and any changes to them, etc.)

Once email has been received information will be provided to customer via over the phone and/or via email received. Rep(s) must then notate the account via paper using form provided by Autophone of Laredo "Action Memo" for any changes requesting any change that may cause pricing changes what so ever. The email that was received must be printed out and attached to "Action Memo" and placed in customer's file.

How to handle outgoing calls

All outgoing Tech calls can be handled by any of Autophone's Employees. These outgoing calls are will only discuss technical issues in reference to customer's account. If at any point the customer should need to ask, change, or request any proprietary information about the account. Technical support staff must transfer the call to our customer service department for further assistance. Once account is verified by our customer support representative, they can proceed and provide information as long as protocols are being followed as mentioned under the incoming call section states.

How to handle information obtained.

Any information obtained that is proprietary to a customer's account it is considered confidential and must not be divulged or past on in any which way that it can cause concerns for account holders. This information cannot be sold or used for any marketing needs whether they be ours or third parties associated with Autophone of Laredo. Customer can have the option to either opt in or out of this option. Customers are notified via email and/or phone call about CPNI. Customer has 30 days to decide if the opt in or out via email to cpni@autophone.net or in writing to P.O. Box 1816, Laredo, TX, 78044.

If customers opt in this information will only be used for marketing purposes related to services or promotion provided by Autophone of Laredo. Once a customer is opted they will be opted in for the whole time customer is with Autophone of Laredo. If customer changes their mind at any time they will have to notify us in writing via email or mail. Our company can take up to 30 days to have them removed from such marketing list.

Proprietary information such as but not limited to credit cards, physical and billing address, emails, etc. is all considered to cause concerns for all account holders. This information is all protected in different ways and protocols should be followed at all times on how this information is safeguarded. Please see how to secure proprietary information.

How to safeguard proprietary information.

- **Credit card information:** This information may only be obtained by the following departments: Billing Representatives, Customer Service, and Sales Department. Once information is received it should be placed only on the Credit Card Slip provided by our company and may not be written in any other place including but not limited to: notepads, post-it, personal/business cell phones, tablets, PC, etc. Once the information is obtain it must be turned over immediately to our Billing Department. When billing has credit card slip, it must be filed according and place on safe and lock safe until further use of it.

- **Copies of IDs:** Copy of any proof of identification is received it must be placed in customers file immediately. Only Billing, Sales, and Customer Service representatives are allowed to have access to this type of documentation.
- **Changes to accounts of any sorts:** Any changes being reported to Autophone of Laredo must be submitted in writing via email or mail to requested addresses. Once documentation is received they must be filed in customers file immediately.
- **Email Passwords:** Passwords for our customer are all to be recorded on Excel Spreadsheet that is safeguarded by our preferred cloud provided Drop Box. This information is only accessible by designated authorized personnel in our office. This information is secured by password protected PC, Laptops, and/or company cell phones. All devices must have an active anti-virus, malware, and spyware software of Autophone of Laredo choice. Customers can request no such copy be kept in or any property of Autophone of Laredo. This can be requested at any time via phone, email, or mail at any time. Once request has been made customer will be responsible to have a full record of their information. A copy of the most current file will be provided to them if requested and account is verified in full. This information must be deleted from company's cloud provider immediately.
- **Customer Files:** Customer files are all to remain at Administration Office at all times. These files may be used at any time by authorized personnel only. No copies should be made from any of the files unless requested by a proper authority such as but not limited to Police Department, FBI, DEA, etc. Administration Office must be locked up while unsupervised at all times.

Security Breaches

Autophone of Laredo has implemented systems designed to provide the status of a customer's CPNI consent prior to the use or disclosure of CPNI. When a customer's opt-in or opt-out CPNI consent election is received, Autophone of Laredo procedures require that the election be recorded in Autophone of Laredo systems. If the customer withdraws approval (including by a subsequent opt-out), Autophone of Laredo has procedures to update the systems to reflect such withdrawal (this does not apply to limited one-time approvals, which expire automatically at the end of the session).

Autophone of Laredo trains appropriate employees about the CPNI rules and Autophone of Laredo's CPNI operating procedures. Such training provides instruction on Autophone of Laredo's practices and procedures for CPNI compliance, including but not limited to how and when CPNI may or may not be used or shared. The training also includes contact information for CPNI inquiries and concerns. The training states that employees may be subject to discipline for failure to comply with Autophone of Laredo's CPNI operating procedures. The disciplinary process may include coaching, written reports, or other actions, up to and including

termination. Online CPNI resources also are available and provide standard forms as well as methods and procedures on how to properly handle CPNI in certain situations.

In the event a breach reportable under section 64.2011 occurs, Autophone of Laredo has established the following notification procedures: No later than seven business days after determination of a CPNI breach, as defined in section 64.2011(e), Autophone of Laredo notifies law enforcement through the reporting facility maintained at <https://www.cpnireporting.gov/cpni/content/disclaimer.seam>. Autophone of Laredo does not notify its customers of or publicly disclose the breach until at least seven full business days have passed after notification of law enforcement, unless Autophone of Laredo believes there is an extraordinarily urgent need to notify any class of affected customers before that time. If the relevant investigating agency directs Autophone of Laredo not to disclose the breach beyond the seven-business day period, in accordance with section 64.2011(b)(3), Autophone of Laredo will not disclose the breach until the agency provides notice that disclosure will no longer impede or compromise a criminal investigation or national security. After completing the process of notifying law enforcement in accordance with section 64.2011(b), Autophone of Laredo procedures require notification to its customers of the breach of those customers' CPNI. Autophone of Laredo maintains records of breaches, notification to law enforcement, and customer notification in customer's file.

How to change PIN number

In the case of PIN number lost/stolen/forgotten, the pin number may be emailed to the email on the account after security questions are verified. If the email cannot be verified/active, the account owner/representative(s), must present themselves(s) at our office location at 1816 Pappas St., Laredo, TX, 78041. They must present a current form of current valid identification (Texas ID/DL and/or passport). They must fill out contract again with same contract existent time frame with new information for PIN and security questions. A copy of the contract will be provided and then PIN and security questions will be updated.