



# Customer Proprietary Network Information

## *CPNI Basic Facts:*

- Effective Date December 8, 2007 – with a 6 month “small business” extension for implementation of rules relating to online authentication requirements such as those relating to password changes.
- CPNI is Call Detail Records (CDRs).
- CPNI is Account Information – specifically connected to a customer’s service relationship with the carrier.
- CPNI is not published names, addresses and phone numbers including directories, subscriber lists and other aggregate customer information.
- Business customers are exempt in some cases where the customer has a dedicated Account Representative or contractual agreement with the carrier.

## *Complying with the FCC’s CPNI Rules is a Nine-Step Process:*

1. Designate a Compliance Officer – as well as a backup Compliance Officer.
2. Train and certify employees on CPNI requirements.
3. Observe Opt-In and Opt-Out requirements.
4. Review existing Service Provider and Affiliate Company contracts, agreements, and customer letters of authorization (LOAs).
5. Notify customers immediately of changes to their accounts, specifically: a password, a backup for forgotten passwords, an online account, or the address of record.
6. Notify law enforcement and customers of any unauthorized disclosure of CPNI.
7. Establish disciplinary procedures for employee violations of CPNI rules.
8. Take measures beyond the FCC rules to discover and protect against pretexting and unauthorized disclosures of CPNI.

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

1. Authenticate every customer.
2. Require a password for call detail records, if this is your company’s policy. (No password is required to obtain non-call detail CPNI).
3. Check the customer’s Opt-Out status.
4. Ask permission to discuss products and services and, when granted, aggressively upsell!

## *Opt-In and Opt-Out Requirements:*

- Choose to Opt-Out or Opt-In. (Note: Your current policies and procedures may or may not require you to choose one of the Customer Notice options shown below. Obtain legal counsel to determine what your company's course of action should be).
- Opt-Out is approval that is obtained when the customer receives initial and periodic CPNI notices and responds as to his choice to "opt out" of use or disclosure of CPNI. Any customers not responding within 30 days (was 33) of the notice can be assumed to be in agreement with use of their CPNI. Notices must be provided every 2 years.
- Opt-In is approval obtained when customer receives a one-time CPNI notice and, by not responding effectively, "opt-ins," or declines their permission to use said CPNI.

## *Additional Points to Note:*

- Prepare and distribute a CPNI Manual. It will help to demonstrate that you have taken steps to protect CPNI from unauthorized disclosure and that the steps you have taken, including your policies and procedures, are reasonable in light of the threat posed by pretexting and the sensitivity of the customer information at issue. Avoid sanction!
- Monitor your company's policies and practices to assure that any changes continue to be in compliance with FCC and state CPNI regulations. Be certain your Compliance Officer has reviewed them.
- Be knowledgeable of your state CPNI rules. To the extent that state rules to protect CPNI do not conflict with federal requirements, you are obligated to comply with federal and state CPNI rules, where applicable. If there is a conflict, you must file a special request for clarification with the FCC.
- If your company has concerns that it will not be able to process passwords by the Dec. 8, 2007, deadline, it may be possible to develop an interim policy that does not allow call detail records to be given to anyone over the phone, fax, or computer; call detail records may be mailed only to the account's billing address. Check with your legal counsel to ensure this interim solution does not conflict with both federal, and your state's, CPNI rules.
- "Work arounds" exist for a variety of CPNI issues. Talk to your consultants to see which may be right for your company.