



# Winnebago Cooperative Telecom Association

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## Customer Update on New CPNI Rules

The Federal Communications Commission (FCC) has adopted new rules designed to better protect the security and confidentiality of Customer Proprietary Network Information (CPNI). CPNI includes call detail information (including the numbers you call, who calls you, and the length of your calls), certain account information (including the services you subscribe to and the amount of your bill) and other individually identifiable and customer specific information. Under the FCC's new rules, telephone companies like Winnebago Cooperative Telecom Association are responsible for maintaining the security and confidentiality of CPNI. Failure to comply with the new rules may result in substantial fines or other penalties. The new rules become effective at the end of the year and will have a significant impact on our relationship with customers. In order to prepare for these changes, we will be phasing in new policies and procedures over the coming months. This interim period will provide all of us with the time needed to adjust to the required changes. Listed below are the biggest changes these new rules will have on our relationship:

- At our retail location, the company can only discuss CPNI with the customer of record or persons designated by the customer of record as authorized to receive information about the account.
- At our retail location, you will be required to show a photo ID when you have questions relating to your account. For certain routine customer service issues, we may be permitted to discuss CPNI if you have all pertinent information with you, such as the bill or call detail information you wish to discuss. For example, you will be required to show a photo ID if you have questions about your bill (including the amount of the bill) but do not have the bill with you.
- For telephone inquiries relating to CPNI, we will be required to authenticate you as the customer of record. We have two options: call you back at the telephone number related to your account or mail the information to your mailing address or e-mail address of record. For certain routine customer service issues, we may be permitted to discuss CPNI if you are able to give our customer representative all the information necessary to assist with your issue.
- If you have access to your account online, it is strongly recommended you have a unique password. This password should not be anything related to your family history or account information. For example, the password should not be your account number, home address, social security number, last four digits of your social security number, mother's maiden name, date of birth, etc.

For your convenience, we have enclosed forms which can be used to designate authorized account users and to designate an e-mail address of record. If you wish to have the option to communicate with us regarding CPNI through authorized account users or via e-mail, you should return these forms at your earliest convenience.

We recognize that the new rules and the procedures are going to change the way we do business. One way to alleviate the potential frustration associated with these policies and procedures is to always have the information in question or required to complete the transaction with you. We apologize in advance for any inconvenience, but failure of Winnebago Cooperative Telecom Association to comply with these rules may result in substantial fines or other penalties imposed by the FCC. We appreciate your understanding and cooperation as we change our policies and procedures to comply with these new FCC requirements.

Thank you for your cooperation.

Winnebago Cooperative Telecom Association

## Adding Authorized Users to Account

Under the new FCC rules governing the use and disclosure of Customer Proprietary Network Information (CPNI), Winnebago Cooperative Telecom Association will only be allowed to discuss CPNI at our retail location(s) with those listed as an authorized user on the account and carrying a photo ID. The only exceptions may be for certain routine customer service issues if you have all pertinent information with you, such as the bill or call detail information you wish to discuss. Remember, CPNI includes call detail information and certain account information, including the amount of your bill. For telephone inquiries, other rules dictate how we authenticate a customer. In order to make your experience with Winnebago Cooperative Telecom Association the best possible, we want to give you the option of adding authorized users to your account. Adding an authorized user does not mean that their name(s) will show up on the bill, but only that these persons will be allowed to discuss CPNI with our company representatives. Please take this opportunity to complete the section below and mail it back to us in the provided envelope.

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Authorized Users to Add to Account:

\_\_\_\_\_  
Legal Name (Print)

\_\_\_\_\_  
Legal Name (Print)

\_\_\_\_\_  
Legal Name (Print)

\_\_\_\_\_  
Legal Name (Print)

**IMPORTANT:** By signing below, the customer is expressly requesting that the company share certain account and call detail information, including Customer Proprietary Network Information, with authorized account users and is authorizing the company to share such information with authorized users as necessary to address service and account inquiries initiated by the account owner or any authorized user.

\_\_\_\_\_  
Account Owner (Print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Telephone Number on Account

## Establishing an E-mail Address of Record

Under the new FCC rules governing the use and disclosure of Customer Proprietary Network Information (CPNI), there are certain circumstances under which Winnebago Cooperative Telecom Association may be permitted to respond to your inquiries regarding call detail information or certain account information only by calling the telephone number listed on the account or sending such information to the mailing address or electronic address of record. Your mailing address of record is the billing address for your account. If you wish to establish an electronic address of record, you must notify us of the e-mail address you wish to designate as your electronic address of record. In order to be considered an electronic address of record, the designated e-mail address must be on file with the company for at least thirty (30) days. This form will establish an e-mail address as an electronic "address of record" only for purposes of service and account inquiries, including inquiries relating to CPNI. This form will not change the billing address for your account. If you wish to establish an electronic address of record for service and account inquiries, please take this opportunity to complete the section below and mail it back to us in the provided envelope.

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Designated E-mail Address for Account Inquiries:

\_\_\_\_\_  
(Print)

**IMPORTANT:** By signing below, the customer is providing the company with express, written approval to communicate via the designated e-mail address in connection with service and account inquiries made by the account owner or designated account users. This approval includes responses to inquiries related to the customer's services generally and specifically to inquiries concerning call detail information and account information, including Customer Proprietary Network Information.

\_\_\_\_\_  
Account Owner (Print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Telephone Number on Account