

## **enTouch Systems**

### **Customer Proprietary Network Information Policy**

ETS Telephone Company, Inc., and ETS Cablevision, Inc., d/b/a enTouch Systems supports our customers' right to privacy.

enTouch Systems carefully follows the guidelines set forth in 47 CFR § 64.2001-2009 and Texas PUC Substantive Rule 26.122: enTouch Systems does not distribute or sell individual customer information to any party other than as required for directory assistance and directory publication.

1. Any request by a third party for customer information will be reviewed by our regulatory staff prior to response. Should the Regulatory Department have any reservations, the request may also be reviewed by Executive Management and/or an independent telecommunications attorney. Requests that would violate any part of USC 47 § 222 or Texas PUC Substantive Rule 26.122 will be immediately denied. Information in aggregate form which may be required for regulatory compliance filings, payments to vendors, or other business applications, does not violate this sanction.
2. Any request to port a telephone number in or out must be accompanied by a properly executed Letter of Authorization from the customer. Any request not accompanied by this document will be denied and returned to the requesting company or customer immediately.
3. All marketing campaigns by ETS Telephone and its affiliates, including En-Touch Systems, Inc., and ETS Cablevision, Inc., are broad in scope. Any campaign that targets individual telephone subscribers is prohibited. The Vice President of Marketing reviews marketing campaigns with the Management Team at weekly staff meetings. Any narrowly focused campaign will also be reviewed by regulatory staff and/or Executive Management and modified appropriately if there is any concern of CPNI compliance.
4. In-bound calls from customers to discuss their service or billing are assumed to be de-facto authorization to review CPNI with the customer. If the caller is not listed on the account, the customer service representative receiving the call will not provide account or service information until verbal approval from the account holder has been received.
5. Any out-bound calls to customers must meet the following guidelines:
  - a. Caller will identify themselves as a representative of ETS Telephone or its affiliate, and will give their name.
  - b. Caller will provide a contact or call-back number if requested.
  - c. Caller will ask permission to discuss customer's service prior to providing any other information or offer.

Failure to comply with this policy will be grounds for disciplinary action for any employee of enTouch Systems, ETS Telephone Company, Inc. or ETS Cablevision, Inc. Gross violations are grounds for immediate termination. Minor infractions such as failure to provide a call-back number on out-bound customer contacts will result in probation, repeated infractions will result in termination.