

Partner Communication  
Frequently Asked Questions regarding CPNI rules

**1. What is CPNI?**

It stands for Customer Proprietary Network Information. CPNI includes the following types of customer-specific information: the products purchased by the customer, the technical characteristics of their service, what type of network equipment the customer has, and all billing information, such as the dates, times, duration of calls and the telephone numbers called by the customer. The Federal Communications Commission (FCC) establishes rules regarding use of CPNI by Carriers, Agents and Referral Endorsers and is responsible for enforcement of those rules.

**2. What are the CPNI rules that apply to a Carrier's employees – (i.e., WINDSTREAM direct sales force and channel managers)?**

CPNI may only be used to market additional WINDSTREAM products and services to the Customer if the customer specifically "opts out" of the use of their CPNI for any purpose other than providing existing services to the customer. The opt-out process is handled in WINDSTREAM through the Customer Service Organization.

**3. What are the CPNI rules that apply to our WINDSTREAM Agent and Referral Partner Channels?**

Unlike the rules applicable to a carrier's employees, under the FCC's current rules Channel Partners and referral partners must obtain "opt-in" consent from customers prior to marketing additional WINDSTREAM services using a customer's CPNI. This "opt-in" consent requires Channel Partners and referral partners to obtain express prior authorization from customers in order to market additional services using CPNI. The current CPNI rules also require carriers like WINDSTREAM to promptly inform certain governmental agencies when there is unauthorized access by third parties of CPNI. Therefore, our Channel Partners and referral partners are required to notify WINDSTREAM in the event that a third party gains unauthorized access to CPNI, including access to CPNI by any person or entity that is not a party to your agent or referral partner agreement with WINDSTREAM. Notice must also be given to WINDSTREAM if CPNI is lost, stolen, or misplaced.

**4. When did these current CPNI rules become effective?**

These current CPNI rules became effective December 8, 2007.

**5. Do these current CPNI rules apply to all carriers selling communication services?**

The FCC's CPNI rules apply to all carriers selling communications services. Therefore, our Channel Partners and referral partners should already be aware of these new CPNI rules and understand the seriousness of noncompliance with these mandatory rules.

**6. How is WINDSTREAM communicating with our existing Channel Partners and referral partners about these CPNI rules?**

All existing WINDSTREAM Partners have electronic access to a letter from WINDSTREAM highlighting the current CPNI rules that apply to our Channel Partners and referral partners and also a Frequently Asked Questions document. WINDSTREAM also provides a compliance reminder through the use of a pop-up screen on the agent and referral partner web-portals that prevents access by Channel Partners and referral partners to customer CPNI without the agent's or referral partner's electronic agreement that they are in compliance with the CPNI rules. CPNI information is also included in our new Agent and Referral Partner welcome kits.

**7. How is WINDSTREAM helping our existing Channel Partners and referral partners comply with these new CPNI rules?**

WINDSTREAM provides our Channel Partners and referral partners with a draft opt-in consent form for their review and use. In the WINDSTREAM CPNI letter, however, we emphasized that Partners must consult with their own attorney to make sure they understand the relevant laws and to ensure they adopt internal processes to protect CPNI in conformity with the law.

**8. What are the possible legal consequences to Channel Partners and Referral Partners for noncompliance with these CPNI rules?**

Noncompliance with these CPNI rules can subject Channel Partners and referral partners to fines and enforcement actions by federal and state governments, termination for legal cause of your WINDSTREAM relationship and litigation from customers. Therefore, strict compliance is mandatory.

**9. How vigilant will FCC enforcement likely be on CPNI compliance?**

The FCC intends to continue aggressively enforcing CPNI compliance. The FCC has previously imposed \$100,000 fines on carriers for CPNI violations. The FCC also adopted a “guilty until proven innocent” presumption against any carrier facing a CPNI complaint.

**10. For new Channel Partners and Referral Partners going forward, how will WINDSTREAM address CPNI?**

WINDSTREAM includes CPNI information within our new Agent and Referral Partner welcome kits and also CPNI reminders through use of a pop-up screen with the Agent and Referral Partner web portals.

**11. Do these CPNI rules apply to Master Channel Partners?**

Master Channel Partners are required to ensure that all of their sub-partner fully comply with these CPNI rules. Noncompliance by sub-partner can subject the Master Agent to fines and enforcement actions by federal and state governments, termination of the agency relationship with WINDSTREAM and litigation from customers.

**12. How long does a customer’s opt-in consent remain valid?**

An opt-in consent that complies with the FCC rules remains valid until the customer changes their consent.

**13. If an agent or referral partner has questions about CPNI, how do they obtain information?**

Channel Partners and Referral Partners may email all CPNI questions to [Channel.Development@Windstream.com](mailto:Channel.Development@Windstream.com). Channel Partners and Referral Partners may email all CPNI questions to [Channel.Development@Windstream.com](mailto:Channel.Development@Windstream.com).