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TDS TELECOM/Quincy
Treatment of CPNI

Docket 060158-TL -

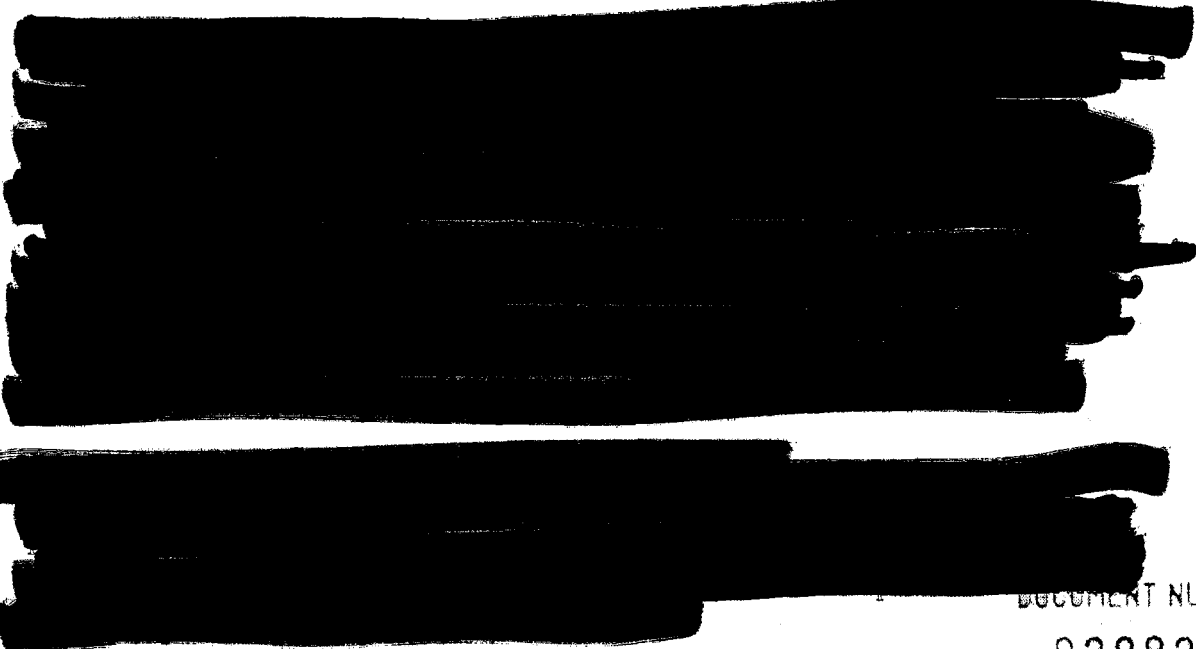
Below please find TDS Telecom's (TDS) response to the investigation of protection of customer proprietary network information (CPNI).

Protecting customer privacy is a fundamental policy of the company. First, except where legally required, TDS does not disclose CPNI to third parties. Under applicable federal law there are certain exceptions where companies are permitted to disclose CPNI to non-communications entities without any customer notice. These instances include the exceptions listed in 47 U.S. C., Section 222(d) (1-3). Other than these types of disclosures, TDS does not disclose CPNI to non-communications entities. Examples for exceptions include;

- Provide records in compliance with court orders or subpoenas.
- Where permitted by law, provide information to collection agencies to obtain payment for past due amounts.
- With customer approval, publish names, addresses and telephone numbers in directories.

In addition, TDS does not share CPNI in a manner that would require it to obtain either "opt out" or "opt in" authorization from a customer. TDS markets communications-related services to its customers using CPNI, as permitted under the "total services approach" outlined in 47 C.F.R. Section 64.2005. TDS may use CPNI during inbound and outbound customer contacts, and in that instance, follows the procedures in 47 C.F.R. Section 64.2008 governing "one time" use of CPNI.

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TDS believes that it has adequate security measures in place to protect customer's private account information particularly as it relates to pretexting. We believe that these procedures provide an appropriate balance between protecting the customers CPNI information, and adequately serve our customer needs. In response to the Attorney General's suggestion that customers should have the option of choose whether to make their account information and records available on-line or over the telephone, TDS Telecom does not support this position and believes it will create customer confusion and dissatisfaction. For example, if a customer were to contact the company to inquire his/her balance due to avoid disconnection, TDS would not be able to provide the information in a timely manner to avoid service disruption. TDS believes that it has in place appropriate safeguards to protect customer information, and the proposal by the Attorney General's office would provide little if any, additional benefits.