



## CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) POLICY

### CPNI PROTECTIONS

As a customer of AES services, you have the right, and AES has a duty, under federal law, to protect the confidentiality of certain types of telecommunications data, including: (1) information about the quantity, technical configuration, type, destination, location, and amount of your use of telecommunications services, and (2) information contained on your telephone bill concerning the services that you receive. This information is known as "Customer Proprietary Network Information or "CPNI". CPNI does not include your customer name, address or telephone number, nor does it include Internet Access Services or Video Services information.

### CUSTOMER APPROVAL

From time to time, AES would like to use the CPNI information it has on file to provide you with information about AES's communications-related products and services or special promotions. AES's use of CPNI may also enhance its ability to offer products and services tailored to your specific needs. To that end, AES would like your approval so that AES may use this CPNI to let you know about communications-related services other than those to which you currently subscribe and that AES believes may be of interest to you. **IF YOU APPROVE, YOU DO NOT HAVE TO TAKE ANY ACTION.**

However, you do have the right to restrict our use of your CPNI. **YOU MAY DENY OR WITHDRAW AES's RIGHT TO USE YOUR CPNI AT ANY TIME BY CALLING 260.333.0100.** If you deny or restrict your approval for AES to use your CPNI, you will suffer no effect, now or in the future, on how AES provides the services to which you subscribe. Any denial or restriction of your approval remains valid until your services are discontinued or you affirmatively revoke or limit such approval or denial.

In some instances, AES will want to share your CPNI with its independent contractors and joint venture partners, if any, in order to provide you with information about AES's communications-related products and services or special promotions. Prior to sharing your CPNI with its independent contractors or joint venture partners, **AES WILL OBTAIN PRIOR WRITTEN PERMISSION FROM YOU.**

### CUSTOMER AUTHENTICATION

Federal privacy rules require AES to authenticate the identity of its customer prior to disclosing CPNI. Customers calling AES's customer service center can discuss their services and billings with an AES representative once that representative has verified the caller's identity. There are three methods by which AES will conduct customer authentication:

- 1) by having the Customer provide a pre-established password and/or PIN;
- 2) by calling the Customer back at the telephone number associated with the services purchased; or
- 3) by mailing the requested documents to the Customer's address of record.

Passwords and/or PINs may not be any portion of the Customer's social security number, mother's maiden name, amount or telephone number associated with the Customer's account or any pet name. In the event the Customer fails to remember their password and/or PIN, AES will ask the Customer a series of questions known only to the Customer and AES in order to authenticate the Customer. In such an instance, the Customer will then establish a new password/PIN associated with their account.

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## NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES

AES will notify customers of certain account changes. Whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, AES will notify the account holder by either the email address that they provided or by mailing the notification to the address of record. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, AES will also send an Account Change Notification.

## DISCLOSURE OF CPNI

AES may disclose CPNI in the following circumstances:

- When the Customer has approved the use of their CPNI for AES or AES's joint venture partners and independent contractors (as the case may be) sales or marketing purposes.
- When disclosure is required by law or court order.
- To protect the rights and property of AES or to protect Customers and other carriers from fraudulent, abusive, or unlawful use of services.
- When a carrier requests to know whether a Customer has a preferred interexchange carrier (PIC) freeze on their account.
- For directory listing services.
- To provide the services to the Customer, including assisting the Customer with troubles associated with their services.
- To bill the Customer for services.

## PROTECTING CPNI

AES uses numerous methods to protect your CPNI. All AES employees are trained on the how CPNI is to be protected and when it may or may not be disclosed. All marketing campaigns are reviewed by an AES supervisory committee to ensure that all such campaigns comply with applicable federal CPNI rules.

AES maintains records of all sales and marketing campaigns that utilize Customer CPNI. Included in these records is a description of the specific CPNI used. AES maintains records of all instances in which CPNI is disclosed to third parties or where third parties were allowed access to Customer CPNI.

AES will not release CPNI during customer-initiated telephone contact without first authenticating the Customer's identity in the manner set-forth herein. Violation of this CPNI policy by any AES employee will result in disciplinary action against that employee as set-forth in AES's Policy Manual.

## BREACH OF CPNI PRIVACY

In the event AES experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require AES to report such breaches to law enforcement. Specifically, AES will notify law enforcement no later than seven (7) business days after a reasonable determination that such breach has occurred by sending electronic notification through a central reporting facility to the United States Secret Service and the FBI. A link to the reporting facility can be found at: <https://www.cpnireporting.gov>. AES cannot inform its Customers of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, unless the law enforcement agent tells the carrier to postpone disclosure pending investigation. Additionally, AES is required to maintain records of any discovered breaches, the date that AES

discovered the breach, the date carriers notified law enforcement and copies of the notifications to law enforcement, a detailed description of the CPNI breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. AES will retain these records for a period of no less than two (2) years.

#### **NOTIFICATION OF CHANGES TO THIS POLICY**

If AES makes modifications to this CPNI Policy, we will post those changes on our website at [www.auburnessentialservices.net](http://www.auburnessentialservices.net) or in other places that we deem appropriate. Our desire is keep you updated as to what information we collect, how we use it, and under what circumstances, if any, we disclose it. If you decide to continue receiving your services after we make any changes to this the CPNI Policy, you shall be deemed to have given your consent to the changes in the revised policy.