



CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) Compliance Policy

CPNI PROTECTIONS

As a customer of HiLight, you have the right, and we have 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 name, address or telephone number.

CUSTOMER AUTHENTICATION

Federal privacy rules require HiLight to authenticate the identity of its customer’s prior to accessing account information housing CPNI. HiLight representatives will use three methods to conduct customer authentication:

- 1) by having the Customer provide their **Account Number**
- 2) by having the Customer provide the **serial or FSAN number on their ONT device**
- 3) by having the Customer provide an established **CPNI PIN number**

NOTIFICATIONS OF CERTAIN ACCOUNT CHANGES

HiLight will notify the account holder by email address when changes are made to their account for security purposes.

DISCLOSURE OF CPNI

HiLight may disclose CPNI in the following circumstances:

- When disclosure is required by law or court order.
- To protect the rights and property of HiLight or to protect Customers from fraudulent, abusive, or unlawful use of 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

Violation of the HiLight CPNI Policy, published on our website at <https://www.hillsboro-oregon.gov/services/hilight/resources/important-documents> by any employee will result in disciplinary action against that employee as set-forth in HiLight’s CPNI Policy Employee Manual.

BREACH OF CPNI PRIVACY

Federal rules require HiLight to report such breaches to law enforcement. Specifically, HiLight 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>. HiLight 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, HiLight is required to maintain records of any discovered breaches, the date that HiLight 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. HiLight will retain these records for a period of no less than two (2) years.

NOTIFICATION OF CHANGES TO THIS POLICY

The City of Hillsboro reserves the right to modify this HiLight Customer Proprietary Network Information (CPNI) Compliance Policy at any time. We will notify you of any material changes via written, electronic, or other means permitted by law, including by posting it at <https://www.hillsboro-oregon.gov/services/hilight/resources/important-documents> on our website. Our desire is to keep you updated as to what information we collect, how we use it, and under what circumstances, if any, we disclose it. If you find the changes unacceptable, you have the right to cancel the Services. If you continue to use the Services after receiving notice of such changes to this the CPNI Policy, you shall be deemed to have given your consent to the changes in the revised policy.

Effective January 1, 2024

Version 2.0