



BREEZELINE LAW ENFORCEMENT HANDBOOK

INTRODUCTION

Breezeline will assist law enforcement agencies in their investigations while protecting customer privacy as required by law and applicable privacy policies. Breezeline conforms to all applicable law when releasing customer information, including: The Cable Communications Policy Act of 1984 (47 U.S.C. § 551); The Electronic Communications Privacy Act (18 U.S.C. § 2510-2522, 2701-2712, 3121- 3127); and the Telecommunications Act of 1996 (particularly, 47 U.S.C. § 222 pertaining to customer proprietary network information or CPNI). The most current versions of these statutes are available from the US Government website: <https://www.govinfo.gov/help/uscode>. Breezeline endeavors to provide timely and accurate responses to all conforming law enforcement and legal requests. **Your request must include a non-disclosure statement directing Breezeline not to disclose the request's existence to the customer** to prevent potential notification to a customer about the existence of the legal request.

This handbook is provided for informational purposes only. Breezeline expressly reserves the right to add, change, or delete any information contained in this handbook at any time and without notice. Furthermore, Breezeline reserves the right to respond or object to, or seek clarification of, any legal requests and treat legal requests for customer information in any manner consistent with applicable law.

CONTACT INFORMATION

Breezeline responds to valid legal requests from state and federal government entities and law enforcement agencies for information and records relating to Breezeline residential and commercial customers.

Breezeline Internet and Breezeline Voice (VoIP) Records

Breezeline accepts service of valid legal requests for Breezeline Internet or Breezeline Voice (VoIP) records either directly or through its third-party processing party, Subsentio, at:

To Breezeline:

Email: Subpoenas@breezeline.com
Fax Number: (617) 687-7711 (available 24/7)

Physical Address: 3 Battery March Park
Suite 200
Quincy, MA 02169
Attn: Legal Department

To Subsentio:

Email: rp@subsentio.com

Business Hours: 8:30 a.m. - 5:00 p.m. Eastern Time

After Business Hours - EMERGENCY ONLY Telephone Number: (866) 382-3087

Physical service may be made on the agent for service of process for Breezeline, available from the secretary of state wherever we do business.

Breezeline Mobile Records

Network Information and Call Detail Records

For information on the device used, call detail records and text message details (date, time, recipient telephone numbers, and text message content), please contact AT&T directly at:

Global Legal Demand Center
11760 US Hwy 1
North Palm Beach, FL 33408
gldc@att.com
Phone: 800-635-6840
Fax: 888-938-4715

AT&T maintains responsibility for CALEA surveillance, pen register/trap and trace, SMS content, video, images, CSLI, and geolocation services for Breezeline Mobile customers.

Customer Information

AT&T does not maintain Breezeline Mobile customer information. For information on Breezeline Mobile customer's billing information such as name, address, and means and method of payment, please contact Breezeline either directly or through its third-party processing party, Subsentio, at general contact information available above.

TYPES OF LEGAL REQUESTS

Generally, the following information, when available to Breezeline, can be supplied in response to the types of requests listed below. Each request is evaluated and reviewed on a case-by-case basis in light of any special procedural or legal requirements and applicable laws. The following examples are for illustration only.

Grand Jury, Trial, or Statutorily Authorized Administrative Subpoena

Law enforcement agencies are eligible to receive customer identification without notice to the customer:

- Customer's name;
- Customer's address;
- Length of service including start date;
- Customer's telephone number, instrument number or other customer number or identity, including a temporarily assigned network address;
- Customer's email account names;
- Means and source of payment for such service (including any credit card or bank account number); and
- In certain instances, email communications older than 180 days with notice.

Judicial Summons

Law enforcement agencies are eligible to receive customer identification including:

- Customer name;
- Customer address;
- Length of service including start date;
- Customer's telephone number, instrument number or other customer number or identity, including a temporarily assigned network address;
- Customer's email account name; and
- Means and source of payment for such service (including any credit card or bank account number).

Court Order

Law enforcement agencies can receive customer identification including:

- Customer name;
- Customer address;
- Length of service including start date;

- Customer's telephone number, instrument number or other customer name or identity, including a temporarily assigned network address;
- Customer's email account names;
- Means and source of payment for such service (including any credit card or bank account number); and
- The content of certain of the customer's email communications can be provided if stated within the order and with notice.

Search Warrant

Law enforcement agencies are eligible to obtain customer identification including:

- Customer's name;
- Customer's address;
- Length of service including start date;
- Customer's telephone number, instrument number or other customer number or identity, including a temporarily assigned network address;
- Customer's email account names;
- Means and source of payment for such service (including any credit card or bank account number); and
- The content of certain of the customer's email communication can be provided if stated within the order.

Consent from Customer

Law enforcement may obtain customer records upon showing that lawful consent was obtained from the customer.

Business Customers

In rare instances, due to our commercial agreement with our business customers, we are required to notify the customer before releasing any information. We will advise you of such before reaching out to the business customer obtaining your consent to do so or allowing you to withdraw the subpoena, warrant or court order.

Important Note on Email Communications:

In most instances, email communications in storage for 180 days or less may only be produced in response to a state or federal warrant and in such situations may be done so without notice to the customer. For email communications in storage for over 180 days, a warrant may also be used, and court orders and valid statutorily authorized administrative subpoenas may be used, but use of these two alternative methods generally requires notice to the customer. Note, however, that Breezeline generally does not store email communications for this period of time: See RETENTION POLICIES below.

Preservation Request/ Backup Preservation Request

Title 18 U.S.C §§ 2703 (f) and 2704 provide a mechanism for law enforcement agencies to require Breezeline to preserve customer data until an appropriate legal order is obtained. No information can be released until Breezeline receives a formal and valid legal request. The information will be retained for 90 days upon which, if no valid legal request is made, or no authorized 90 days extension is sought, the information will be permanently purged.

Pen Register/ Trap and Trace Device

Title 18 U.S.C. § 3123 provides a mechanism for authorizing and approving the installation and use of a pen register or a trap and trace device pursuant to court order. Breezeline uses a third-party vendor, Subsentio, to assist with the processing of all such orders. All orders must be coordinated prior to submission to Breezeline.

Foreign Intelligence Surveillance Act of 1978 (FISA)

Title 50 U.S.C §§ 1801- 1862 and new §§ 105A and B. Submission to Breezeline should be coordinated with the FBI field office in Boston, MA. A Special Agent will be tasked to hand deliver the request to Breezeline. Such requests should be sent to the attention of the General Counsel. Upon receipt, Breezeline will handle all documents with the appropriate care and security as required by law.

National Security Letter

All National Security Letters should be coordinated with the FBI field office in Boston, MA. A Special Agent will be tasked to hand deliver the request to Breezeline. Such requests should be sent to the attention of the General Counsel Upon receipt, Breezeline will handle all documents with the appropriate care and security as required by law. Attention must be paid to the various court proceedings in which the legal status of such request is at issue.

Child Exploitation

Breezeline will make information available to the National Center for Missing and Exploited Children as required by 42 U.S.C § 13032.

***57 - Customer Originated Trace**

Customer Originated Trace - Provides the recipient of an obscene, harassing, or threatening call the ability to request an auto-trace of the last call received.

Emergency Disclosure

18 U.S.C § 2702 (b)(8) and § 2702 (c)(4) contain provisions for the expedited release of customer information in situations where there is an immediate danger of death or an immediate risk of serious physical injury. Law enforcement agencies must adequately complete the appropriate Breezeline Emergency Situation Disclosure Request form (forms attached) and they will receive accelerated customer identification.

Whenever the Emergency Disclosure request is received by phone after business hours, we will request the requestor's name and operator ID or badge number and validate the requestor's identity by placing a call to a publicly validated telephone number of the appropriate law enforcement agency before proceeding with the release of customer information.

Civil Matters

Legal requests for records for a civil matter must be served through Breezeline's registered agent, Corporation Service Company, in the relevant state. Generally, attorney-signed subpoenas are insufficient when seeking any customer information or records, and Breezeline will require a judge-signed court order providing for notice to the customer and an opportunity to challenge any disclosure before releasing customer information in a civil matter.

INTERNET COMPLIANCE

Breezeline has the ability to identify Breezeline Internet customer accounts based on the following criteria:

- Internet Protocol (IP) addresses including date and time of incident;
- Customer name and address;
- Email account identifier; and
- Customer account number.

Typically, upon receipt of a properly and timely (within 6 months) submitted valid and statutorily authorized legal request, Breezeline can supply the customer's name, address, telephone number, email accounts, Breezeline customer account number and current account status.

For identification based upon an IP address:

Before sending a request, please confirm that the IP address is assigned to Breezeline. This can be accomplished by visiting <https://whois.arin.net/ui/> or <https://www.ip2location.com/>. Please note that Breezeline's residential customers are not assigned a static IP address, but rather are assigned a dynamic IP address that may change from one user session to another.

For identification based upon an email address:

All email address accounts obtained through Breezeline Internet service will end in @breezeline.net (e.g. JohnDoe@breezeline.net). If the email account ends in any other domain (i.e. @hotmail.com or @yahoo.com), Breezeline will not have information responsive to the request.

For identification based upon a person's name:

Breezeline cannot identify a customer based upon a name alone. It is necessary to include the street address where it is believed the individual receives service. It may be possible in some cases to identify a customer based on name and a city and state (with no street address).

Breezeline will only respond to a request for identification based on the name exactly as it is written on the request. For example, if the request asks for information relating to James Doe in Springfield and Breezeline's records reveal a J. Doe and/or a Jim Doe in Springfield, Breezeline will not have information responsive to the request or may require additional legal process to determine if it has responsive information. If initials or nickname are used you should add a request for those other

versions of the name in your legal request.

For identification based upon a street address:

It is necessary to provide an entire street address. In the request please supply the house or apartment number, the street name, the city and the zip code of the location you have targeted. Over a length of time it is possible that Breezeline has supplied service to multiple customers at the same address. Therefore, it is necessary to narrow a search for customer identify to a specific period of time.

For identification based upon a Breezeline account number:

Please provide a complete account number. Legal request with incomplete account numbers will not result in successful identifications.

Internet Service Retention Policies IP Address Information

Breezeline currently maintains Internet Protocol address log files for a period of at least six (6) months. If Breezeline is asked to respond for information relating to an incident that occurred beyond this period, we may not have responsive information and may not be able to fulfill a legal request. Breezeline can process and respond to preservation requests as outlined below in this Handbook.

Web Mail Account Information for email contents and attachments

Breezeline Internet customer accounts are currently provided with up to 10 separate email accounts. Customers may choose to not use Breezeline email at all, instead using another provider’s email such as Hotmail or Yahoo Mail, or use those email services in addition to a Breezeline email account. In cases involving another entity’s email service or account, Breezeline would not have any access to or ability to access customer email in response to a legal request. Legal requests seeking the contents of emails or attachments to emails should also be aware of the following:

- Where customers use Breezeline email, they may use the Breezeline Webmail service. This permits customers to access their email from any internet connected computer. In this case, the contents of emails are stored on Breezeline’s email servers where they may be produced in response to a legal request if they have not been deleted by the customer or gone beyond the default retention period.
- Customers may also use an email client program like Outlook Express, Outlook or Eudora to move or “pop” emails from Breezeline’s email servers to their own personal computer. In those cases, emails may be deleted from Breezeline’s email servers and if they are deleted, than they are not accessible to Breezeline.
- Customers may also use Webmail and email client program and leave emails on Breezeline’s email servers as well as copy, not move, them to their personal computers. In these cases, emails that remain on Breezeline’s email servers may be produced in response to a legal request if they have not been deleted by the customer or gone beyond the default retention period.

Default Retention Period

Breezeline’s Webmail service permits customers to change their email deletion policies but the current default settings are described below:

Inbox	(Read Mail- 30 day retention period) (Unread Mail - 30 day retention period)
Trash	(Read Mail - Indefinitely, storage limitations apply) (Unread Mail - Indefinitely, storage limitations apply)
Sent Mail	(Read Mail - Indefinitely, storage limitations apply) (Unread Mail - Indefinitely, storage limitations apply)
Screened Mail	(Read Mail - Indefinitely, storage limitations apply) (Unread Mail - Indefinitely, storage limitations apply)
Personal Folders	(Read Mail - Indefinitely, storage limitations apply) (Unread Mail - Indefinitely, storage limitations apply)

Pop3 Mail (Deleted immediately from web mail servers)

Note: Breezeline Internet customers can set their own preferences for certain web mail deletion or retention; thus, individual's customer accounts may have settings that differ from those above.

MOBILE AND VOICE COMPLIANCE

Breezeline can provide certain customer account information and related records when provided with a Breezeline Voice (VoIP) or Breezeline Mobile telephone number it currently or historically served or included as a customer contact number.

For identification based upon telephone number(s):

Breezeline can only provide account information on telephone numbers with which we currently or have historically provided service.

For identification based upon a person's name:

Breezeline cannot identify a customer based upon a name alone. It is necessary to include the street address where it is believed the individual receives service. It may be possible in some cases to identify a customer based on name and a city and state (with no street address).

Breezeline will only respond to a request for identification based on the name exactly as it is written on the request. For example, if the request asks for information relating to James Doe in Springfield and Breezeline's records reveal a J. Doe and/or a Jim Doe in Springfield, Breezeline will not have information responsive to the request or may require additional legal process to determine if it has responsive information. If initials or nicknames are used, you should request those other versions of the name in your legal request.

For identification based upon a street address:

It is necessary to provide an entire street address. In the request please supply the house or apartment number, the street name, the city and the zip code of the location you have targeted.

Over a length of time it is possible that Breezeline has supplied service to multiple customers at the same address. Therefore, it is necessary to narrow a search for customer identify to a specific period of time.

For identification based upon a Breezeline customer account number:

Please provide a complete account number. Legal request with incomplete account numbers will not result in successful identifications.

Voice Service Retention Policies

Call Detail/Text Message Records

Breezeline maintains 1 year of historical call detail records (records of local and long distance connections) for our Breezeline Voice (VoIP) service. This includes local, local toll, and long distance records. AT&T controls the retention policy for the call detail/text message records for Breezeline Mobile, and they are generally stored for up to 3 months.

Account Records

Account records are generally stored for approximately 1 year after the termination of an account. If the account has an outstanding balance due, records may be retained for a longer period of time.

***57 - Customer Originated Trace**

Customer Originated Trace - Provides the recipient of an obscene, harassing, or threatening call the ability to request an auto-trace of the last call received. When the customer has registered a Complaint with law enforcement and completed a Letter of Authorization (Form Attached), Breezeline will release *57 information to law enforcement.

CABLE TELEVISION COMPLIANCE

For customers to our cable television service, the Cable Act requires Breezeline as a cable operator to disclose personally identifiable information to a governmental entity solely in response to a court order (and not, for example, a subpoena) or with the customer's express written consent. The Cable Act requires that the cable customer be afforded the opportunity to appear and contest in a court proceeding relevant to the court order any claims made in support of the court order. At the proceeding, the Cable Act requires the governmental entity to offer clear and convincing evidence that the subject of the information is reasonable suspected of engaging in criminal activity and that the information sought would be material evidence in the case. See 47 U.S.C § 551(h).

Rev. 3-19-2024

Breezeline LEA Emergency Request Authorization Form

(To be completed by Law Enforcement Only)

Please call (866) 382-3087 before faxing a signed copy of the Emergency Request Form to (617) 687-7711.

Identity of Requesting Party

LEA _____
Representative _____
Address _____ Phone _____ Cell _____
Fax _____ Email _____
Nature and Extent of Emergency _____

Customer Information Sought _____

Customer Identification (i.e. name , address, e mail, IP address, telephone number) _____

Interception of Communication Sought (if applicable) _____

Purpose of Interception _____
Type of Interception _____
Duration of Interception (Request over 48 hours cannot be honored without a court order) _____

Has court order been requested? _____ Name of Court _____
If not requested, when will it be requested? _____

Indemnification

The requesting party acknowledged that this request is made solely as a result of an imminent threat to life or of serious bodily harm and that the information shall not be obtained shared or disseminated for any unlawful or harmful purpose. Requesting party affirms the above information, represents he has the authority to execute this form and agrees to indemnify and hold Breezeline, its subsidiaries, employees, and agents harmless for any claim, demand, loss or injury, including attorneys' fees brought against Breezeline by a third party, including the customer, as a result of Breezeline's compliance with this request. The requesting party will forward a subpoena, court order or warrant to Breezeline at (617) 687-7711 or via email at Subpoenas@breezeline.com within 2 days of submitting an emergency request.

Law Enforcement Signature

Date

Please call (866) 382-3087 before faxing a signed copy of the Emergency Request Form to (617) 687-7711. Please also send a copy to Subpoenas@breezeline.com.

LETTER OF AUTHORIZATION FOR CALL TRACE

(To be completed by Breezeline customer)

To Whom It May Concern:

By this letter I authorize Breezeline to establish a call trap on telephone number (____) ____ - ____ for the purpose of determining the identity of the person or persons responsible for making nuisance, harassing, or threatening telephone calls to the above number.

I agree to prosecute the person or persons apprehended as a result of information obtained through the trap and trace procedures performed on my behalf.

I have filed a complaint with my local law enforcement agency and the following information is provided:

- a. Name of law enforcement agency: _____
- b. Address of law enforcement agency: _____
- c. Telephone number: _____
- d. Fax number: _____
- e. Case/ Complaint Number: _____
- f. Investigating Officer: _____
- g. Investigating Officer Email: _____

I understand that any information obtained as a result of the trap and trace will be provided only to the law enforcement agency named above.

Customer Signature: _____
Name: _____
Agency: _____
Date: _____