



Policy Name: Customer Premise Privacy & Data Collection	Category: Customer Service & Information
	Last Approval Date: 2-19-26
Approved by: William C. Ebberts, Board President	Signature:
Review Frequency: Annually	Origination Date: 2-19-2026
Revision Dates:	Last revised by:

Policy

This policy outlines CusterTel’s practices for protecting customer privacy when technicians install services or perform service-related work at customer premises. It explains what information is collected, why it is collected, and how it is safeguarded.

Purpose

CusterTel complies with applicable federal and state privacy and telecommunications regulations, including the Idaho Data Breach Notification Law, Idaho Public Records Act, Idaho Communications Privacy Act, and the operational standards of the Idaho Public Utilities Commission. All information collected during installation is used solely for service verification and maintenance and is protected in accordance with these requirements.

Types of Information Collected

During installation or maintenance visits, our technicians may collect information including but not limited to:

- **Photographs of installed equipment** (e.g., ONT, modem, power supply, grounding, wiring).
- **GPS coordinates of the service location**, confirming the physical location where service is provided.
- **Wifi signal strength**
- **Customer signature documenting permission for visit and approval of work**

No photographs of individuals, personal belongings unrelated to the installation, or interior living spaces beyond what is necessary to log equipment placement shall be taken.

Purpose of Data Collection

The information collected is used **solely for legitimate business purposes**, including:

- Verifying proper installation and service configuration
- Maintaining accurate service records
- Supporting troubleshooting and repairs
- Ensuring network reliability and service availability
- Meeting regulatory or audit requirements applicable to telecommunications providers

CusterTel does **not** use this information for marketing, customer profiling, or any unrelated purpose.

Privacy and Data Protection

CusterTel is committed to safeguarding customer information. To ensure privacy:

- Information is stored in secure, access-controlled systems.
- Access is limited to authorized personnel who need the information to perform their job duties.
- Data is retained only as long as necessary for operational, regulatory, or legal purposes.
- CusterTel does not share, sell, or disclose customer premise data to outside parties unless required by law or with the customer's consent.

Technician Responsibilities

All field technicians shall:

- Collect only the minimum information necessary to document installation work.
- Avoid capturing unnecessary personal areas or items in photographs.
- Immediately report any accidental collection of sensitive or unrelated content to their supervisor.
- Follow all CusterTel privacy, security, and data-handling protocols.

Customer Assurance

CusterTel is committed to treating all customer information with respect and care. The information collected during service installation is used **only for internal operational purposes to maintain consistent, reliable service** for our members and customers. If customers have questions about how their information is used, they may contact our office for assistance.

References

1. **Idaho Communications Privacy Act**, governing unauthorized access to wire, electronic, or oral communications. Idaho Code Title 18, Chapter 67.
2. **Idaho Data Breach Notification Law**, requiring security safeguards and customer notification in the event of a breach involving computerized personal information. Idaho Code §§ 28-51-104 through 28-51-107.
3. **Idaho Public Records Act**, defining public records (including digital photographs and GPS data) and establishing exemptions for sensitive or privacy-protected information. Idaho Code §§ 74-101 through 74-127.
4. **Idaho Public Utilities Commission (IPUC) Rules**, including the Telephone Customer Relations Rules (IDAPA 31.41.01) governing customer service practices and information handling.
5. **IPUC Rules of Procedure**, requiring compliance with Idaho's Public Records Act in utility operations (IDAPA 31.01.01).
6. **FCC Broadband Consumer Privacy Guidelines**, setting expectations for broadband providers regarding consumer data transparency, security, and use. FCC-16-148.
7. **Idaho Code § 40-520**, clarifying broadband provider responsibilities when documenting broadband installation locations within rights-of-way.