



August 3, 2022

VIA EMAIL

Chairwoman Jessica Rosenworcel
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Chairwoman Rosenworcel:

I am writing on behalf of Consumer Cellular, Incorporated (Consumer Cellular) in response to your July 19, 2022, letter regarding Consumer Cellular's retention policies for its customers' geolocation data and its policies for sharing such information with third parties.

Consumer Cellular is committed to protecting the privacy of its customer information. As explained below, Consumer Cellular does not collect geolocation information of its current or former subscribers, and therefore is not in a position to store or to share such information with third parties. Consistent with our commitment to our customers, our general privacy and data security policies and procedures are described in our privacy policy, available on our website, and in the terms and conditions provided to subscribers. Consumer Cellular regularly reviews its privacy and data security practices and procedures to account for changes in legal obligations and improvements in technology.

As a mobile virtual network operator (MVNO), Consumer Cellular contracts with mobile network operators (MNOs) to provide mobile voice and data service to subscribers. The information provided by the MNOs to Consumer Cellular varies, and could include: (i) the city, state, and local access and transport area (LATA) of the call origination, or (ii) the switch used for the call, outgoing and incoming cell trunks, and the market from which the subscriber made the call. But Consumer Cellular has no ability to poll, in real time, for subscriber location, nor do we passively log any latitude or longitude information from subscribers.

Consumer Cellular currently maintains the information described in the preceding paragraph in our online systems for four months and offline in back-up files from our MNO partners from 2018. We currently maintain call origin city and state information with invoice and billing information from 2010. All such information is maintained in the United States and used by Consumer Cellular for customer usage review, invoicing and billing. Customers cannot opt out of Consumer Cellular's retention policies as they relate to this data, but while the data are in Consumer Cellular's control, we employ commercially reasonable administrative, technical, and physical safeguards to protect it. Consumer Cellular does not collect or maintain geolocation information for consumers who access their account online or by using the mobile app.

As discussed above, Consumer Cellular does not collect and therefore does not share geolocation information with third parties. As to the customer information described above that Consumer Cellular does maintain, to the extent that Consumer Cellular receives a legitimate law

enforcement request for information in its custody and control, Consumer Cellular responds accordingly.

Please contact the undersigned at Bobbie.Reyes@consumercellular.com with any questions about this response.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Bobbie L. Reyes". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bobbie L. Reyes
General Counsel
Consumer Cellular, Incorporated