



*Office of the CEO*

August 3, 2022

**VIA EMAIL: [Jessica.Rosenworcel@fcc.gov](mailto:Jessica.Rosenworcel@fcc.gov)**

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

Dear Chairwoman Rosenworcel,

We are in receipt of your letter of inquiry dated July 19, 2022, wherein you ask about our policies around geolocation data.

As an innovator in the mobile industry, Red Pocket champions customer choice and privacy. We appreciate your shining a light on the important and timely topic of customer geolocation data collection and sharing by internet service providers.

Red Pocket, as a mobile virtual network operator, does not collect geolocation data such as A-GPS from our customers. We therefore do not collect or retain geolocation data. Nor do we share geolocation with or sell it to any third party.

However, we note that the billing records (also known as call detail records, or CDRs) that we receive from our underlying network operators may show a given subscriber's cellular market or metropolitan statistical area at the time that a particular call, text, or data event occurred.

Such generalized data provides no insight into a customer's precise geolocation, and is generally not considered to be "geolocation data" in the telecommunications industry.

This more generalized location information contained in call detail records is stored securely by us.

We only share such information with outside parties under the following circumstances in compliance with our company policy and obligation to protect Customer Proprietary Network Information (CPNI):

1. To the end user customer of the service, upon proper authentication, so that the customer may review the billing and usage information associated with her or his account with us.
2. To appropriate legal authorities upon receipt of a court order, subpoena, or similar warrant that compels our disclosure under the law.

We trust that our response answers any questions that you may have at this time regarding our practices and policies around geolocation data. We would be happy to discuss this response further at your request.

Sincerely,

A handwritten signature in black ink that reads "Joshua Gordon". The signature is written in a cursive, flowing style.

Joshua Gordon