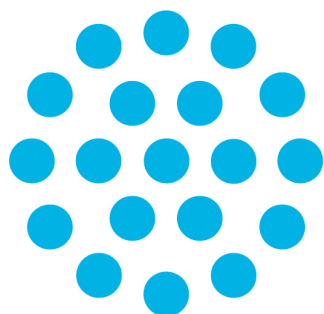




Uniti

Law Enforcement Agency (LEA) Handbook

All information contained herein should be considered confidential. This information has been prepared and distributed for Law Enforcement only. If you have received this, please do not disclose, copy, or distribute to anyone other than an authorized law enforcement official.

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Introduction

Uniti Group, Inc. (NASDAQ GS: UNIT), a FORTUNE 500 company, (through its operating company subsidiaries) is a premier insurgent fiber provider dedicated to enabling mission-critical connectivity across the United States. Uniti's nationwide fiber network is built to power businesses, communities, and next-generation digital applications with 217,000+ route miles of fiber connect major metro areas, rural communities, and high-demand business hubs across 47-states. Whether you need enterprise-grade connectivity, wholesale transport solutions, or high speed residential internet, Uniti delivers scalable, reliable, and future-ready fiber solutions wherever you need them. The company also provides data, cloud solutions, unified communications and managed services to business and enterprise clients. More information about Uniti and its products and services is available at <https://www.uniti.com>.

Uniti assists law enforcement agencies in their investigations while protecting subscriber privacy as required by law and applicable privacy policies. The main federal statutes that Uniti must conform to when releasing subscriber information are: 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); Communications Assistance for Law Enforcement Act (47 U.S.C. §§ 1001-1010); and the Telecommunications Act of 1996 (particularly, 47 U.S.C. § 222 pertaining to customer proprietary network information or CPNI). Uniti also complies with all applicable state and federal laws.

Uniti's primary goal is to provide *timely* and *accurate* responses to all law enforcement and legal requests. Uniti has highly qualified personnel who are responsible for complying with legal requests made of Uniti. Unless otherwise required by the request, Uniti's goal is to provide a response within ten business days of each request. If necessary, Uniti employees can offer testimony in support of subscriber identifications at reasonable costs. However, Uniti encourages the use of affidavits to avoid personal court appearances and costs wherever possible.

Note: This Handbook is provided for informational purposes only. Uniti expressly reserves the right to add, change, or delete any information contained in this Handbook at any time and without notice. Furthermore, Uniti reserves the right to respond or object to, or seek clarification of, any legal requests and treat legal requests for subscriber information in any manner consistent with applicable law. This Handbook is only for law enforcement to use in connection with criminal requests. For civil request instructions please call the Law Enforcement Support Center at 877-999- 7705, option 1.

Uniti Wholesale

Uniti Wholesale provides large-scale communications infrastructure and network services to other telecommunications providers, wireless carriers, government entities, and major business customers. In simple terms, this part of Uniti supports the high-capacity fiber networks and transport services that help keep organizations and service providers connected across wide geographic areas. It is generally the segment law enforcement may encounter when an issue involves backbone fiber routes, transport facilities, or wholesales network services.

Kinetic

Kinetic is Uniti's consumer and small-business brand, providing Internet and fiber-based communications services to homes and local business. This is the part of the company most commonly associated with residential broadband and community-based Internet service. For law enforcement, Kinetic is the brand most likely to be referenced in matters involving household Internet accounts, small business connectivity, or services provided directly to local communities.

Uniti Fiber

Uniti Fiber focuses on delivering fiber-based connectivity services to business, government, healthcare, education, and other institutional customers. Its role is to support organizations that need reliable, high-speed communications for daily operations. In a law enforcement context, Uniti Fiber may be relevant when dealing with enterprise or public-sector service locations, dedicated fiber connections, or business-grade network services.

Uniti Solutions

Uniti Solutions provides managed technology, cloud, and security services for business and enterprise customers. While other parts of Uniti focus primarily on network connectivity, Uniti Solutions supports customers with broader technology needs such as manager IT environments, cloud services, and security solutions. For law enforcement, this section helps distinguish technology and managed-service offerings from standard Internet or transport services.

Legal Compliance (Subpoena, Search Warrant, Court Order):

Uniti's Law Enforcement Support Center (LESC) is located at 4005 Rodney Parham Road, Little Rock, Arkansas 72212 and is responsible for the production of Uniti records involving subscriber information for Kinetic Voice and Internet, Uniti Solutions, Enterprise Business Services, and Wholesale Services. The LESC is also responsible for matters involving Uniti's Small Business, Enterprise and Wholesale network & data, and voice services.

Uniti uses Corporation Service Company (CSC), 866-403-5272 as the registered agent which can accept the submission of legal requests *for criminal and civil matters*. If, as a law enforcement officer, your legal request *must* be served in your state of origin you may contact CSC local office for submission. They do accept legal request via email. CSC's email for service of process is EmailedSOP@cscglobal.com

Routine Requests and Information

877-999-7705

Option 1. Law Enforcement Support Center

Option 1. Status of Subpoenas

Option 2. EXIGENT situations

Option 2. Annoyance/High Volume of Debt Collections Calls

Option 3. International Fraud Dept.

Imminent Loss of Life or Serious Bodily Injury

877-999-7705 Option 1, Then Option 2

Or

Directly @ 501-748-7364

Emergency disclosure form will be required for the release of any subscriber information

Fax Number

330-486-3131

Fax for Preservation/Exigent/SS Trap & Trace Requests

Mailing Address

1519 S Bowman Road, Suite G

Little Rock, AR 72211

Attn: Law Enforcement

Support Center (Custodian of
Records)

Subscriber Account Identification

Subscriber Account Identification and Related Records

For identification based upon a *telephone number*:

- Uniti can only provide account information on telephone numbers for which we currently or have historically provided service. The current company which provides service to a specific telephone number can be obtained by contacting Neustar. Neustar is the company which serves as the FCC-appointed administrator of the North American Numbering Plan (NANP). To obtain provider information from Neustar, you must first have an account active at Neustar. Neustar's website is <https://www.neustar.biz/> and the NANP website is <http://www.nanpa.com/>.

For identification based upon an *Internet Protocol (IP) Address*:

Before sending a request, please confirm that the IP address is assigned to Uniti Group, Inc. or one of its subsidiaries; (ex. Windstream). This can be accomplished by visiting <https://www.arin.net/> and inputting the IP address.

- Upon receipt of a properly executed, valid and statutorily authorized legal request Uniti can usually supply the subscriber's name, address, telephone number, account number, account balance, and payment information and, depending on the Uniti service(s), to which services they subscribe.
- Because Uniti's system of allocating IP addresses uses Dynamic Host Configuration Protocol (DHCP) for its residential subscribers, they are not assigned a constant or static IP address. Instead, a dynamic IP address is assigned and has the potential to change throughout the course of service. Thus, it is necessary in all requests for subscriber information linked to a specific IP address that you supply the *specific date and time including time zone of the incident when an IP address is involved*.
- Uniti does offer static IP addresses to its small business and enterprise customers. It is still necessary to provide a date and time of the incident when an IP address is involved. Uniti does not keep individual use records on static accounts. Contact information is provided for the company that the static IP block is assigned to. End-user and connection logs will have to be provided by the company that it is assigned to. Any questions about this information please call the Uniti's Law Enforcement Support Center.
- Uniti currently maintains its dynamic IP address log files for many years, however once a customer closes an account, it is no longer kept for business purposes and is purged from Uniti's records.

For identification based upon a *circuit*:

Uniti does offer circuit IDs (CIDs) to its small business and enterprise customers. These are treated like static accounts; therefore we would not have individual use records. Contact information will be provided for the company that the CID belongs to. End-user and connections logs will have to be provided by the company that it is assigned to. Any questions about this information please call the Uniti's Law Enforcement Support Center.

For identification based upon an *email address*:

All residential email address accounts currently issued through Uniti's Kinetic Internet will still have the heritage Windstream domains ending in *Windstream.net* (i.e. JohnDoe@Windstream.net). If the residential email account ends in any other domain (i.e. @dejazzd.com, @gmail.com, @hotmail.com or @yahoo.com), please use the <https://mxtoolbox.com> tool to determine what provider is hosting that email. We can only provide responses for email accounts that are Uniti or Uniti subsidiaries.

For identification based upon a *person's name*:

- Uniti cannot identify a subscriber based upon a name alone. It is necessary to include the street address, account number, phone number or other identifiable information where it is believed the individual receives service. It may be possible in some cases to identify a subscriber based on name and a city and state (with no street address).
- Uniti 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 Uniti's records reveal a *J. Doe* and/or a *Jim Doe* in Springfield, Uniti 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 variations 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, state, and the zip code of the location you have targeted.
- Over a length of time it is possible that Uniti has supplied service to multiple customer at the same address. Therefore, it is necessary to narrow a search for customer identity to a specific period of time.

For identification based upon a *Uniti account number*:

- Please provide a complete account number. Legal requests with incomplete account numbers will not be able to be processed.

For Identification based upon a specific *payment method*:

- J. For bank account search provide the DDA, Routing number, date the payment was applied to the account and dollar value that was paid on that date.
- K. For credit card, complete credit card number and the date the payment was applied to the card, provide the dollar value and institution which issued the card.

Retention Policies

Retention Policies – Uniti Group, Inc.

Internet IP Address Information

- L. Uniti currently maintains dynamic IP address log files for many years, however once a customer closes an account, it is no longer kept for business purposes and is purged from Uniti's records.

Web mail Account Information for email contents and attachments

- M. Uniti's Kinetic Internet customer accounts are currently provided the option of having up to five separate @Windstream.net email accounts. Customers may choose to not use Uniti email and may use another provider's email such as Gmail or Yahoo Mail, or use those email services in addition to a Uniti email account. In cases involving another entity's email service or account, Uniti does not have any access to or ability to access those other customer email accounts in response to a legal request. Legal requests seeking the *contents* of emails or attachments to emails should also be aware of the following:
- N. When customers use Uniti's (heritage Windstream) email, they may use the heritage Windstream Webmail service that is branded Kinetic. This permits customers to access their email from any Internet connected computer. In this case, the contents of emails are stored on Uniti's email servers where they may be produced in response to a legal request if they have not been deleted by the customer. Uniti requires a warrant for the release of all content data regardless of the amount of time the content has been in electronic storage.
- O. Customers may also use an email client program like Outlook Express, Outlook, Vista mail or Eudora to move or "pop" email from Uniti's email servers to their own personal computers. In those cases, emails may be deleted from Uniti's email servers and if so, they are not accessible by Uniti.
- P. Customers may also use Webmail and an email client program and leave emails on Uniti's email servers as well as copy (not move) them to their personal computers. In these cases, emails that remain on Uniti's email servers may be produced in response to a proper legal request if they have not been deleted by the customer. Uniti requires a warrant for release of all content data.

Retention Policies – Uniti Voice

Accessing Call Detail Records

- Q. Uniti maintains historical call detail records for our Uniti Voice telephone service for 18 months. This includes local, local toll, and long-distance records. In limited instances, records may be available up to two years.

Legal Requests

Types of Requests

Generally, the following information, when available to Uniti, 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.

Special Note for our cable television service only: The Cable Act requires Uniti, as a cable operator, to only disclose personally identifiable information to a governmental entity *solely* in response to a court order (and not, for example, a subpoena) in a criminal proceeding or with the subscriber's express written consent. When the request is related to an account that has cable TV service only the Cable Act requires that the cable subscriber be afforded the opportunity to appear and contest in a court hearing relevant to the court order any claims made in support of the probable cause 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 reasonably 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). Once this opportunity has been afforded the subscriber, and the court enters an appropriate order, then Uniti may respond.

If, however, your investigation includes the fraudulent use of a credit card or identity theft, please contact the Uniti's Law Enforcement Support Center and we will discuss options for obtaining basic cable television account information in response to a subpoena or court order without a hearing. If you do not have legal process but need information preserved, please refer to the Preservation section.

Important Note on Email Communications (Contents): The contents of email communications in storage will *only* be produced in response to a state or federal warrant.

Child Exploitation

Uniti prioritizes lawful demands for subscriber information that relates to the exploitation of children. In order to provide a faster response, the demand must reference that the matter involves the exploitation of children. In addition, Uniti will make information available to the National Center for Missing and Exploited Children as required by 18 U.S.C. § 2258A.

Court Order or Search Warrant (both signed by a Judge)

Law enforcement agencies are able to obtain subscriber identification including:

- 1) Subscriber's name
- 2) Subscriber's address
- 3) Length of service including start date
- 4) Subscriber's telephone number, instrument number or other subscriber number or identity, including a temporarily assigned network address.
- 5) Subscriber's email account names
- 6) Call Detail (records of local and long-distance calling connections)
- 7) Means and source of payment for such service (including any credit card or bank account number).
- 8) The content of the subscriber's email communications can be provided if stated within the warrant and with notice (refer to Preservation Request section). Uniti only provides contents of communications in response to a warrant.

Emergency Disclosure

18 U.S.C. § 2702(b)(8) and § 2702(c)(4) contain provisions for the expedited release of subscriber information in situations where there is an immediate danger of death or an immediate risk of serious bodily injury. Law enforcement agencies need only complete Uniti's Emergency Situation Disclosure Request form (Reference Attachment #1) and they will receive accelerated subscriber identification. Proper legal process must be submitted after the emergency has subsided. The emergency number to contact Uniti's Law Enforcement Support Center (LESC) to initiate this process is **501-748-7364. *This number is for Law Enforcement Agencies with emergencies ONLY.***

Foreign Intelligence Surveillance Act of 1978

Title 50 U.S.C. §§ 1801-1862 and §§ 105 A and B submissions to Uniti should be coordinated with the FBI field office in Little Rock, AR. A Special Agent will be tasked to hand deliver the request to Uniti. Upon receipt, Uniti will handle all documents with the appropriate care and security as required by law.

Grand Jury, Trial, or Statutorily Authorized Administrative Subpoena

Law enforcement agencies are able to receive subscriber identification (except cable TV only subscribers) including items (1-7) without notice to the subscriber:

- 1) Subscriber's name
- 2) Subscriber's address
- 3) Length of service including start date
- 4) Subscriber's telephone number, instrument number or other subscriber

- number or identity, including a temporarily assigned network address
- 5) Subscriber's email account names;
- 6) Call Detail (records or local and long-distance calling connections)
- 7) Means and source of payment for such service (including any credit card or bank account number); and

Judicial Summons

Law enforcement agencies are able to receive subscriber identification including:

- 1) Subscriber's name
- 2) Subscriber's address
- 3) Length of service including start date and end date.
- 4) Subscriber's telephone number, instrument (model or serial) number or other subscriber number or identity, including a temporarily assigned network address.
- 5) Subscriber's email account names;
- 6) Call Detail (records of local and long distance calling connections)
- 7) Means and source of payment for such service (including any credit card or bank account number).

National Security Letters

All National Security Letters should be coordinated with the FBI field office in Little Rock, AR.

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. All orders must be coordinated with the Uniti Law Enforcement Support Center prior to submission to Uniti. Law enforcement will be asked to agree to reimburse Uniti's reasonable costs incurred to purchase and/or install and monitor necessary equipment as defined in section labeled "Uniti Fee Schedule."

Preservation Request/Backup Preservation Request

Title 18 U.S.C. §§ 2703(f) and 2704 provide a mechanism for law enforcement agencies to require Uniti to preserve subscriber data *already in its possession as a "snapshot" at a specific time, and not on an ongoing, continual basis*, until an appropriate legal order is obtained. No information can be released until Uniti receives a formal and valid legal request. The information will be retained for ninety days upon which, if no valid legal request is made, or no authorized ninety day extension is sought, the information will be permanently

deleted. If an extension is sought, the information will be retained for an additional ninety days upon which, if no valid legal request is made, the information will be permanently deleted. If law enforcement desires to capture ongoing real-time data during the period of time between the preservation request and the obtaining of legal process, a valid Order for wiretap or pen register must be presented.

Wiretaps and Interception of Communications

Title 18 U.S.C. § 2510 provides a mechanism for authorizing and approving the interception of a wire, oral, or electronic communication pursuant to court order. All orders must be coordinated with the Uniti Law Enforcement Support Center prior to submission to Uniti. Law enforcement will be asked to agree to reimburse Uniti's reasonable costs incurred to purchase and/or install and monitor necessary equipment. Please refer to section entitled "Uniti Fee Schedule".

Quick Reference

The checklist below is a quick reference guide for producing a valid legal submission to Uniti and will help reduce processing time associated with overly broad or erroneous submissions.

- ✓ Verify that the phone number, IP address or email address is registered to Uniti or one of its subsidiaries. For phone numbers, follow the instructions referenced earlier in the Handbook. For IP addresses, go to <https://www.arin.net/>. Most Uniti residential email addresses end in *@Windstream.net*.
- ✓ Limit each request to no more than five telephone numbers, IP addresses or email address elements per individual legal document. This will allow us to manage your request more effectively and provide a quicker response.
- ✓ Include the IP address, date and time of use, email address, street address, phone number and all other pertinent information that will allow Uniti to adequately respond to your request.
- ✓ Your request should specifically state what you require Uniti to provide; we do not make assumptions about the information being sought and will not provide “extra” information.
- ✓ Do not use language which is specific to one company. Use general terms such as “call detail records” rather than an acronym for call detail records that one company might use and another may not.
- ✓ Include date and time of all incidents including seconds and time zone, i.e. 12 December 2014 @ 06:13:21 EST. State on your request specifically what you require Uniti to provide and be sure it conforms to what the Electronic Communications Privacy Act permits; overly broad requests often require additional follow up and may slow response time.
- ✓ Ensure that you completely explain the nature and circumstances of any potential serious injury or death to justify an emergency disclosure.
- ✓ Ensure that all of your contact information is correct. Uniti will return legal requests via email unless otherwise requested in the subpoena or order. We can provide CD, USPS, or overnight mail.

Uniti Fee Schedule

The Law Enforcement Support Center does not charge for responses on legal processes served by a government entity involving child exploitation. In all other situations, Uniti reserves the right to seek reimbursement for processing and responding to all legal process as permitted by law. Our policy is to discuss reimbursement with the requesting party before we incur any costs. However, in time-sensitive situations we may have to discuss costs after the fact. A detailed list of our fees can be found on the Uniti Fee Schedule. Please request a copy from the Law Enforcement Support Center or locate your copy online on our resource page. Costs for the implementation of a Court Ordered Pen Register/Trap-Trace, Title III, Title 50 and/or FISA on each provisioned platform are as follows:

- Intercept: \$1,250.00 per target for either Business or Residential customer. It is \$750.00 for monthly maintenance per target or \$2,250 every 3 months per target.
- Stand-alone email collections (header information and/or full content) will be charged at the same rates outlined in the previous bullet.
- Simple Modify (DID CHANGE) - Billed Immediately at \$15.00 per target
- Troubleshooting (per hour - charged in 15 min increments) - Billed immediately @\$60.00
- Requesting Law Enforcement Agencies must complete a CALEA Worksheet (See Attachment 2) providing detailed billing information and authorized point(s) of contact.
- Billing will occur upfront for the install and monthly maintenance for the first 3 months of surveillance unless otherwise noted in the docket. If interception extends past the 3 months, then billing will occur at each 3 month interval.
- Call Detail records released in response to an ongoing Court order: \$150.00 per week for one time per week delivery of incoming and outgoing call detail records or email headers/logs for the duration of the original order and any extension of the original order. More frequent delivery of call detail records or email headers/logs is an additional \$50.00 per delivery.
- For all requests that necessitate Uniti employee travel for installation and/or other technical support, Uniti asks the requesting agency to reimburse Uniti for all reasonable, documented travel and related expenses.

Appendix

REQUEST FOR EMERGENCY DISCLOSURE OF SUBSCRIBER INFORMATION

Please complete the form below in detail to assist Uniti Group Inc. and subsidiaries in deciding whether to exercise its discretion to disclose user data pursuant to 18 U.S.C. § 2702(b) (8) and § 2702(c) (4).

Requesting Law Enforcement Agency	
Agency Name	
City/State/Province/Country	
Phone Number	
Requesting Officer	
Officer Name	
Title/Rank/Badge ID	
Email Address	
Phone Number:	

The undersigned law enforcement official is specifically designated by the Attorney General, the Deputy Attorney General, the Associate Attorney General or the principal prosecuting attorney of the state or sub division there of acting pursuant to a statute of that state to command technical assistance and/or subscriber information from Uniti Group Inc. and its affiliates in this emergency situation. The undersigned hereby request Uniti to voluntarily disclose the user data requested below based upon the provisions of 18 U.S.C. § 2702. Specifically, the undersigned hereby represents that there is an emergency situation that requires disclosure without delay of information relating to the emergency. Refer to the Attestation section below on what constitute as a emergency situation.

The undersigned law enforcement official provides the following information to assist Uniti Group Inc. in forming a good faith belief that disclosure of the user data requested is warranted.

1. What is the nature of the emergency involving death or serious physical injury?	
2. What is the imminent nature of the threat? Please provide information that suggests there is a specific deadline before which it is necessary to receive the requested information and/or that suggests there is a specific deadline on which the act stated in response to Question 1 will occur (e.g., tonight, tomorrow at noon)	
3. What specific information are you requesting from Uniti? Please identify the relevant Uniti accounts (by name, address, email address, IP address, or telephone number). Please make your request as narrow as possible; requesting all information available for an account will delay the processing of your request.	Target IP or Phone #: _____ Date and Time (with time zone) for IP or Phone#: _____ Other: _____ _____ _____

Attestation	The undersigned affirms that this request is made solely as a result of an emergency situation involving (i) the immediate danger of death or serious physical injury to a person, (ii) conspiratorial activities threatening the national security interest, or (iii) conspiratorial activities characteristic of organized crime that requires the installation of an interception before an order authorizing such interception can, with due diligence, be obtained, or (iv) an ongoing attack on a protected computer (as defined in 18 U.S.C § 1030) that constitutes a crime punishable by a term of imprisonment greater than one year that requires installation before an order can, with due diligence, be obtained; and that this emergency requires Windstream to disclose without delay of the information sought above; and that the information sought relates to the emergency. The undersigned affirms that the information shall not be obtained, shared or disseminated for any unlawful or harmful purpose. The undersigned affirms that there are grounds upon which an order could be obtained under this chapter/code to authorize such electronic surveillance or subscriber information request and direct Windstream to provide specific information, facilities and technical assistance. Uniti Group Inc. is required to have a subpoena/court order within 72 hours of the exigent request. The undersigned affirms that an application for an order will be made within 72 hours of receipt. If you can not comply, please state your reason below.
Reason for not obtaining a follow-up subpoena	

Uniti is hereby commanded to provide subscriber information for the above specific information (listed IP or Phone on the listed date and time). No cause of action shall lie in any court against Uniti for complying in good faith with this certification.

Signature of Requesting Officer	
Date and Time of Request	

Uniti Group Inc.
Law Enforcement Support Center
2101 Riverfront Drive
Little Rock, Arkansas 72202
501-748-7364 – On-Call Phone
330-486-3131 Fax, email: LEA@uniti.com

If there are multiple phone targets please attach a sheet with all numbers and DIDs associated with each. Thank you.