

LAW ENFORCEMENT AND REGULATORY AGENCY SUPPORT GUIDELINES FOR INFORMATION REQUESTS TO INTELIGENT

APPLICABILITY OF GUIDELINES: These guidelines are intended **only** to facilitate the timely, orderly receipt and processing of federal, state or local law enforcement or regulatory agency (“**Submitting Agency**”) subpoenas, summons, court orders, civil investigative demands, agency orders, search warrants and production orders (“**Information Requests**”) to Inteliquent (as hereinafter defined). Parties to civil litigation matters for which Inteliquent (as hereinafter defined) is a non-party must instead serve subpoenas consistent with our **separate** Civil Subpoena Policy. Inteliquent does not consent to service by any civil litigation party pursuant to these guidelines. **By transmitting an Information Request or an Exigent Circumstances Request via email or Inteliquent’s website as contemplated and invited by these guidelines, a Submitting Agency acknowledges the applicability of these guidelines, which establish certain necessary details (page 2) and conditions for Inteliquent’s acceptance and processing of the same.** Where an Information Request transmitted via email is inconsistent with the requirements and conditions of these guidelines, the Submitting Agency will be invited to conform the Information Request to these guidelines by supplemental response, enabling processing to then occur. Submitting Agencies that are unable to comply with requirements and conditions for transmission via email must instead serve Information Requests upon Inteliquent at the physical addresses specified in “CONTACT INFORMATION...” (page 3), or upon a registered agent of Inteliquent. Observance of these guidelines by a Submitting Agency will avoid the delayed receipt and/or delayed processing, or non-receipt of Information Requests by the following entities (collectively “**Inteliquent**”), to whom these guidelines apply:

- **Onvoy, LLC d/b/a Inteliquent
- **Inteliquent, Inc. f/k/a Neutral Tandem, Inc. (and its Neutral Tandem state-specific operating subsidiaries)
- **Broadvox, LLC
- **Layered Communications, LLC
- **Voyant Communications, LLC
- **ANPI Business, LLC d/b/a Voyant Communications, LLC
- **Vitelity, a division of ANPI Business, LLC

Inteliquent primarily provides **wholesale telecommunications services** to other telecommunications carriers, resellers, and service providers (“Provider Customers”). Accordingly, Inteliquent generally will not have information concerning end users of telephone numbers (calling or called parties who are subscribers to our Provider Customers). **Nevertheless, to satisfy customer proprietary network information (“CPNI”) obligations (see “CPNI STATEMENT” [page 2]), Inteliquent can generally only provide information about a telephone number in response to an Information Request.** Inteliquent’s response will typically be the identification of Inteliquent’s Provider Customer(s) for the target telephone number(s) and the provision of their contact information. End user subscriber information would then need to be pursued by the Submitting Agency through the Provider Customer(s) so identified. Submission of Information Requests consistent with these guidelines will facilitate Inteliquent’s processing, which in turn, will facilitate timely further pursuit of the information sought by the Submitting Agency.

TIMING CONSIDERATIONS: It is expected that all Submitting Agencies will promptly submit Information Requests upon issuance and further, provide a reasonable interval for compliance; however, it is understood that the nature of certain matters will require expedited handling. Although processing times will vary generally and given the nature of certain Information Requests, Inteliquent will typically respond within **five to seven business days** to Information Requests submitted **consistent with these guidelines.**

Given the fluctuating volume, preliminary review of any Information Request may only occur on a next day or second business day **after** transmission of the same to Inteliquent. Accordingly, where any Information Request compliance date is **three business days or less after the date of submission**, inclusion of the compliance date (and/or other reference – e.g., “URGENT” or “EXPEDITED PROCESSING REQUIRED”) **in the subject line** of the submitting email will call attention to the same for timely processing.

METHODS OF TRANSMISSION: In the interest of timely, orderly processing, Inteliquent invites Submitting Agencies to transmit Information Requests **via dedicated email address** (see “NECESSARY DETAILS...” [page 2] and “CONTACT INFORMATION...” [page 3]). Email submission ensures the immediate, centralized receipt (into a queue accessible by legal department personnel only) and processing of complete, legible Information Requests. Inteliquent **does not consent** to the transmission of Information Requests **via facsimile or otherwise inconstant with these guidelines.** A Submitting Agency that transmits an Information Request to any facsimile number **assumes the risks** of disclosure, incomplete transmission, delayed receipt and processing, and non-receipt and non-processing altogether.

Please see “CONTACT INFORMATION...” (page 3) for submission of matters by agencies that cannot utilize email or otherwise conform their Information Request to the requirements and conditions of these guidelines.

Please see “EXIGENT CIRCUMSTANCE MATTERS” under “CONTACT INFORMATION...” (page 3) specifically concerning the submission of matters for which a law enforcement agency seeks to certify to Inteliquent the nature of an emergency that represents an immediate danger of death or serious physical injury, and for which the agency lacks sufficient time to obtain and provide an Information Request to Inteliquent.

NECESSARY DETAILS FOR INFORMATION REQUESTS AND SUBMITTING EMAILS

NECESSARY DETAILS – GENERALLY: Observance of the following will help to ensure timely, orderly processing:

1. **EMAIL SUBJECT LINE:** specify here: (a) the agency’s reference number (e.g., case, file, docket, or other applicable tracking number) and (b) for matters requiring a response within **three business or less after submission**, the compliance due date and/or other statement (e.g., “URGENT” or “EXPEDITED PROCESSING REQUIRED”) to call attention to the same.
2. **SINGLE TRANSMISSION:** each submitting email will transmit only one Information Request. Multiple Information Requests should **not be combined** into one PDF file **or attached** to a single email. See item #4 for submission of Information Requests covering multiple target numbers.
3. **COMPLIANCE DATE:** clearly specify the compliance date in the Information Request (or the date, per applicable law, where unstated) in the subject line or body of the submitting email. For a compliance date **three business days or less** after the date of submission, call attention to the same by including the date (and/or other reference – e.g., “URGENT” or “EXPEDITED PROCESSING REQUIRED”) specifically **in the subject line**. Inteliquent will assume that no specific compliance date exists for matters submitted without identification of the same and accordingly, will enter the matter into in our tracking system with a compliance date that is 20 business days after receipt.
4. **MULTIPLE TARGET NUMBERS:** where an Information Request pertains to multiple numbers or is part of a series of Information Requests by an agency, the body of the submitting email should list the numbers covered by the attached Information Request in the format of XXX-XXX-XXXX (omitting parentheses, periods, and other marks, and utilizing hyphens only). Doing so will limit the risk of transposed or erroneous digits and help to ensure timely processing and orderly tracking.
5. **“REPLY TO” EMAIL ADDRESS:** where the sender of a submitting email is not the Submitting Agency’s intended recipient for Inteliquent’s response, **include the recipient’s address** as a “CC” on the submitting email (or otherwise designate the address in the submitting email). This will help to reduce the risks of illegible, transposed, or mistyped characters.
6. **ENGLISH REQUIREMENT:** all Information Requests transmitted via email to Inteliquent must be in English. Inteliquent does not consent to the email transmission of Information Requests composed in other languages.

NECESSARY DETAILS – TARGET NUMBERS ONLY WITH AREA CODE 559 or 661: For target numbers with an area code of 559 or 661, the following details must be summarized on a **per call basis** for each target call, and can be provided in the Information Request, as an exhibit to the Information Request, or in the body of the submitting email:

1. The calling number
2. The called number, including any alternative number(s) associated with that calling number that may have been involved in the call (e.g., toll-free number and the local number to which it points; a number that forwards to the number that answered a call).
3. The date and time of the call, including the relevant time zone designation (e.g., Central Standard Time).
4. The duration of each call, if available

NECESSARY DETAILS – TARGET NUMBERS WITH AREA CODES OTHER THAN 559 and 661: Telephone number portability results in the routine movement of numbers between providers. Accordingly, for numbers in all other area codes, in addition to specifying the target number, at a minimum, please specify the **relevant target interval** for which information is sought. For Information Requests submitted pursuant to a court order or warrant that has resulted in the establishment of a pen register, trap and trace, or wire tap/intercept arrangement (“Intercept Arrangement”), the requesting document must affirmatively state that the target number: (a) was captured as a number that was either called by or placed a call to the target number for which the Intercept Arrangement was installed; (b) such call(s) occurred during the interval specified in the court order or warrant (a copy of which must be transmitted, including any relevant extensions of the same) for the existence of the Intercept Arrangement; and (c) specify the provision(s) in the court order or warrant which require Inteliquent to provide information concerning the target number(s).

PEN REGISTER, TRAP AND TRACE, AND WIRE TAP / INTERCEPT ORDERS

Pen registers, trap and trace arrangements, and wiretap/intercepts are implemented on behalf of Inteliquent by a third-party provider. Upon receipt of an order directing Inteliquent to establish a pen register, trap and trace or wiretap, Inteliquent will notify its third party provider, who will then contact the law enforcement agency directly to arrange for implementation of the Order. The third-party provider is **NOT authorized** to accept service of an Information Request on behalf of Inteliquent. Rather, such orders must be submitted to Inteliquent as provided in “Contact Information”.

CPNI STATEMENT

In compliance with the Federal Communications Commission Orders concerning Customer Proprietary Network Information (“CPNI”) and the company’s CPNI Policy, customer information cannot be released without a valid subpoena, summon, court order, civil investigative demand, agency order, search warrant or other formal demand from an agency authorized to request such information.



CONTACT INFORMATION FOR INFORMATION REQUESTS AND EXIGENT CIRCUMSTANCES

ROUTINE MATTERS / STANDARD BUSINESS HOURS: In the interest of the timely, orderly processing of all Information Requests, Inteliquent invites Submitting Agencies to transmit the same via the dedicated email address legal@inteliquent.com.

Email submission to legal@inteliquent.com ensures the immediate, centralized receipt (into a queue accessible by all legal department personnel) and processing of complete, legible Information Requests, and protects the contents of the same from non-disclosure beyond such noted personnel. **A Submitting Agency that transmits an Information Request to any facsimile number or other email address assumes the risks of disclosure, incomplete transmission, delayed receipt and processing, and non-receipt and non-processing altogether.**

INTELIQUENT DOES NOT CONSENT TO THE TRANSMISSION OF ANY INFORMATION REQUEST TO ANY FACSIMILE NUMBER OR TO OTHER EMAIL ADDRESSES, INCLUDING WITHOUT LIMITATION, TO THE INDIVIDUAL EMAIL ADDRESSES IDENTIFIED IN THIS “CONTACT INFORMATION” SECTION. Matters should not be transmitted to any such other email addresses, including without limitation, redundantly with submissions to legal@inteliquent.com.

Inteliquent identifies the following contact persons for inquiries by Submitting Agencies during standard office hours (8:00 to 5:00 pm Central), as well the following physical addresses for inclusion by Submitting Agencies on any Information Request. A Submitting Agency seeking to verify that a number is with Inteliquent should **not transmit or present** such any such inquiries to the contact persons identified below or to the NOC (please refer to “FAQ” no. 5 for more information). [

Submitting Agencies that are unable to transmit Information Requests via email must instead serve such matters upon Inteliquent at the following physical addresses, or upon a registered agent of Inteliquent:

Primary Contact: Penny Stanley
10300 6th Avenue North
Plymouth, MN 55441
Phone: 720-590-7085
Email: penny.stanley@inteliquent.com

Secondary Contact: Regina Echols
10300 6th Avenue North
Plymouth, MN 55441
Phone: 216-373-4855
Email: regina.echols@inteliquent.com

Secondary Contact: Scott Kellogg
550 West Adams Street, 9th Floor
Chicago, IL 60661
Phone: 312-384-8086
Email: scott.kellogg@inteliquent.com

EXIGENT CIRCUMSTANCE MATTERS: a law enforcement agency must certify to Inteliquent the nature of an emergency that represents an immediate danger of death or serious physical injury, for which the agency lacks sufficient time to obtain a subpoena, summons, court order, civil investigative demand, search warrant or production order (“Exigent Circumstances”). Exigent Circumstances declarations are to be submitted **only** via the following page:

<http://www.inteliquent.com/contact-us/contact-legal>

As specified on the above-referenced page, Inteliquent **cannot perform a “GPS Ping” on a number**. Please do not submit such requests. **For exigent matters concerning 559 or 661 area code calling numbers, please refer to “NECESSARY DETAILS”.... (page 2).**

Inteliquent’s response to any Exigent Circumstances declaration is **entirely conditioned upon** the agency’s subsequent provision of a subpoena, summons, court order, civil investigative demand or search warrant to Inteliquent for any information provided as soon as circumstances permit the agency to obtain the same thereafter. By submitting an Exigent Circumstances declaration to Inteliquent, the submitting agent certifies to Inteliquent: (a) the existence of Exigent Circumstances; (b) the agency will provide an Information Request to Inteliquent as soon as circumstances permit; and (c) the agent has the authority to make the Exigent Circumstances declaration on behalf of the agency and further, to commit the agency to subsequently obtain and provide the Information Request.

AFTER HOURS: For assistance after hours, weekends or holidays, please contact our Network Operations Center (“NOC”):

800-933-1224 - Option 2
866-388-7258

Legal Compliance FAQs

1. Is there a fee for providing a response to an Information Request?

Typically, Inteliquent will not charge a fee for Information Requests that seek information about a routine quantity of target numbers. Fees may apply for Information Requests that are determined by Inteliquent to be seeking information about a voluminous quantity of target numbers, including in the aggregate (e.g., where a Submitting Agency submits a series of requests, for each of which, a fee would otherwise not apply) or which involve exceptional costs to be incurred by Inteliquent for retrieval and restoration of archived records.

Where Inteliquent receives an Information Request for a voluminous quantity of target numbers, the Submitting Agency will be advised of Inteliquent's determination and presented with cost and time estimate for production of the requested information, and the Submitting Agency must provide written authorization for the same before the requested information will be researched, compiled, and produced by Inteliquent.

2. Do you notify your customer upon receipt of an Information Request?

As noted above, we primarily provide **wholesale telecommunications services** only to Provider Customers. Accordingly, we generally do **not** notify our Provider Customers of receipt of Information Requests from Submitting Agencies. Customers may be provided notice, however, of the receipt of a subpoena in a civil litigation matter. As provided above, parties to civil litigation matters must serve civil subpoenas consistent with our **separate** Civil Subpoena Policy.

3. If my Information Request is defective, will you still accept it for processing?

No. Inteliquent generally cannot accept any secondary document to resolve defects or inconsistencies within any Information Request received, including without limitation, lack of a necessary signature, an erroneously stated number, one or more missing pages, or the submission of the matter only after the compliance date provided for in the Information Request. Inteliquent must receive an Information Request that is complete, timely submitted, and which creates a legal obligation for Inteliquent to produce the information specified in the Information Request (and any exhibits and/or attachments which are clearly referenced in and are part of the Information Request).

Any Information Request received only after the compliance date established in the same will be presumed void, and the Submitting Agency will be requested to direct Inteliquent to a provision of law that requires the same to nevertheless be regarded as a valid Information Request to which the Inteliquent is nevertheless obligated to respond, and establish a reasonable interval within which the response is to be provided (such interval being comparable to the original interval between issuance of the Information Request and the compliance date established therein).

4. Do you accept Information Requests directed to Vitelity Communications, LLC; Vitelity, LLC; VCLS, LLC; Infotelecom, LLC; 360networks (USA), Inc.; or Zayo Group, LLC.

No. We will not respond to any Information Request directed to any of the above-named companies. We will only respond to Information Requests directed to one of the companies listed on page 1 of these guidelines. Please contact Penny Stanley at 720.590.7085 for additional information.

5. I know that Inteliquent mainly provides wholesale telecommunications services and that numbers frequently move between service providers. Is an Information Request really required, and can you at least tell me in advance if the number is with your company?

While Inteliquent's customers are typically Provider Customers, Inteliquent must nevertheless observe CPNI requirements (please see our "CPNI Statement", above). It is understood that Submitting Agencies only want to submit Information Requests to the correct service provider. Inteliquent must process Information Requests as a priority and consistent with compliance intervals specified for the same. However, Inteliquent will attempt reply to inquiries seeking verification of a number as being with Inteliquent on an as time permits basis, and can promise no specific interval within which a response can be provided. Such Inquiries should only be made via email (and only to the dedicated address legal@inteliquent.com) **where necessary**, and should clearly specify the target number as well as the relevant target interval.

Such requests should be presented only as a matter of necessity. Please do **not** routinely request verification or present requests for multiple target numbers. Please do **not** attempt to verify a number by telephone call (telephone requests may be declined and no return call may occur in response to any requesting message) or by message to any alternative email address, including those provided in these guidelines. Emails to legal@inteliquent.com are delivered into a queue that is accessible by **all legal department staff**. As such, transmission to legal@inteliquent.com allows for the most efficient processing of such email inquiries, and is the only option presented by Inteliquent for submission of the same.

Inteliquent expects that all Submitting Agencies adequately investigate matters and utilize their resources to identify Inteliquent as the relevant service provider. Accordingly, Inteliquent may decline to reply to such inquiries from agencies presenting excessive such requests or where Inteliquent finds that matters are not sufficiently researched via agency resources prior to submission of inquiries to Inteliquent.

6. My agency only wants request the disruption of service for one or more numbers, not information. What do we need to do?

Disruption requests must refer to a statutory or other basis supporting the request; clearly identify the target number(s) (including specifying date(s), time(s), and applicable time zone); summarize use of the target number(s) that is the basis for the request; and either produce documentary evidence of such use or sufficient details that enable Inteliquent to verify such use or otherwise recreate use consistent with the summary provided.

7. My agency only wants to request the preservation of records held by your company at this time. What do we need to do?

Inteliquent's customers are typically Provider Customers. Such Provider Customers will be the parties from whom a Submitting Agency will ultimately obtain end user subscriber information. Moreover, Inteliquent generally maintains its records on an archived basis for an extended interval, and there is no risk of loss of information – to the extent Inteliquent has such relevant information (i.e., the identity of our Provider Customer and provision of their contact information). Accordingly, please just submit instead your agency's Information Request at the time of its issuance only.

8. Do you accept Canadian Information Requests?

Onvoy, LLC is a registered reseller in Canada. As such we do accept Canadian Information Requests in accordance with the guidelines set forth above. If direct service upon Onvoy, LLC is not allowed, please contact Penny Stanley for additional information concerning service of the Information Request