

NT Spark, LLC

CALEA Policy and Law Enforcement Request Method of Procedure

The Communications Assistance for Law Enforcement Act (“CALEA”) is intended to preserve the ability of law enforcement agencies to conduct electronic surveillance while protecting the privacy of information outside the scope of the investigation. We will also require compliance with our Customer Protected Network Information (“CPNI”) Policy when responding to a request made under this CALEA Policy. NT Spark, LLC (referred to as the “Company”) is a VoIP service provider and internet service provider. As the entity facing the end-user subscriber, the Company is the entity that can best verify the identity of the end-user subscriber and furthermore is the best source for records relating to both the telephone number in use and the end-user subscriber.

Call Detail Records (“CDRs”)

Typically, CDRs must be pursued directly from the entity facing the end user/subscriber. To the extent we have CDRs they are readily accessible for approximately 45 days. Compliance with our CPNI Policy will be required when responding to any request for CDRs. If, after your review of our CPNI guidelines, you believe the Company is the appropriate source for providing CDRs, please contact our CPNI Officer.

Civil Subpoenas

Subpoenas issued in matters of civil litigation in which the Company is a non-party must be served in accordance with our Civil Subpoena Guidelines, which also provides for methods of service, applicable fees, and requirement for a protective order when seeking CDR's.

Civil Subpoena Guidelines

Civil litigants will generally want to issue an initial request to the Company for the purpose of identifying our customer and thereafter, pursue CDRs through a legal subpoena directly to that customer. The Company will initially and conditionally provide an estimate of the Company CDR Processing Fee applicable to all requests for CDRs.

Protective Order

Where the Company is required to provide/produce CDRs, such production will only occur pursuant to a protective order issued by the court having jurisdiction in the case. Such orders will be limited in both access and use, specifically for purposes of litigation and appeal.

Trace Back Exception

Call Trace Back is the exceptional, isolated circumstance in which the Company CDRs may contain some unique information. *Call Trace Back* is the telecom industry's process

of recreating the path of a telephone call in reverse (i.e., going from the called party's service provider to one or more intermediate providers, and ultimately to the calling party's service provider). If the calling name/number is spoofed/blocked that manipulation occurs prior to the network and therefore our records reflect only the spoofed/blocked details, the network-level details of a CDR will remain unaffected. By recreating the call path, the originating network can be determined, and thereby, the actual calling number and end user subscriber's identity. Specific details will be required, by way of example "the call from NPA-NXX-1234 to NPA-NXX-5678 on MM/DD/YYYY at 12:23 pm ET for 45 seconds". Allow at least twenty-four (24) hours for a *Call Trace Back* request for a call made within the prior forty-five (45) days. *Call Trace Back* requests for calls made more than forty-five (45) days prior will typically require archive retrieval and must allow at least fifteen (15) business days for processing, and an ICB processing fee will apply. Fees may also apply for voluminous requests. The Company shall cooperate with *Call Trace Back* requests as may be applicable and in compliance with our STIR/SHAKEN and Robocall Mitigation Policy.

Submitting a Formal Lawful Request for Information:

All requests must include, at a minimum, the following information:

1. Full contact information with Agency name, physical address, Email address and direct contact telephone number.
2. Target telephone number(s) in the XXX-XXX-XXXX format.
3. Specific dates (To/From in MM/DD/YYYY format) for which information is being requested.
4. Brief description of the matter.

Email the request to regulatory@ntspark.coop with a copy of your subpoena, court order, search warrant, or other formal legal documentation. If you have multiple requests, please submit only one legal document per email to ensure individual tickets are created in our system. For requests involving ten (10) or more numbers, please attach an Excel or text file listing target telephone numbers in the XXX-XXX-XXXX format, one (1) telephone number per line.

Official Address for Service of Process:

Contact	Regulatory Agent
Mail	NT Spark, LLC c/o Regulatory Agent PO Box 609 Houston, MS 33951
Email	regulatory@ntspark.coop

Faxed legal demands will NOT be processed. Submit Legal Demands via email to regulatory@ntspark.coop. We do NOT consent to fax transmission.

Normal Hours of Availability:

Our normal business hours are Monday through Friday, 8:00 am to 5:00 pm.

Exigent Formal Lawful Requests:

If you have a declared exigent circumstance as established by your agency's guidelines, email regulatory@ntspark.coop with the word "Exigent" in the subject line.

Exigent Requests Outside Normal Business Hours:

If you have a declared exigent circumstance as established by your agency's guidelines, outside of our normal business hours, email regulatory@ntepa.com with the word "Exigent" in the Email subject line. Written requests will be required; no action will be taken based on a verbal request.

Intercept Arrangements:

The Company is generally the optimal point for intercept arrangements as we carry all traffic relating to a telephone number across our network, but it may be necessary to engage our 3rd Party Voice provider. If you believe that we are the appropriate location for your register/intercept, please first contact regulatory@ntspark.coop for assistance. Upon receipt of an order or warrant directing the Company to establish an intercept arrangement and following verification of the Submitting Agency's understanding of the limitations as described herein, the Company will notify applicable third-party vendors, who will then contact the Submitting Agency directly to arrange for implementation, where applicable. The applicable third-party vendor is NOT authorized to accept service of a Legal Demand on behalf of the Company.

Note: The Company is a VoIP Service Provider and not a wireless carrier; therefore, there is no pingable, GPS, or cell site location information native to our Service Provider customers' numbers and therefore not available from us.

The Company reserves the right to modify this CALEA Policy at any time. We will notify you of any material changes via written, electronic, or other means permitted by law, including by posting it on our website. If you find the changes unacceptable, you have the right to cancel the Services. If you continue to use the Services after receiving notice of such changes, we will consider that as your acceptance of the changes.

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