



**SECRETARIAT
IM / TELECOM**

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December 9, 2005

DEC 09 2005
8665-C12-200513483

Gerry Lylyk
Director, Consumer Affairs
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

**GI / TELECOM
SECRETARIAT**

Dawn Hunt
Vice-President
Government & Intercarrier Relations

Dear Mr. Lylyk:

Sent via fax and email

Re: File #8665-C12-2005 13483 Consumer Privacy

1. As requested in your letter of December 2nd, 2005, please find attached an abridged version of the report Rogers Wireless Partnership (RWP) filed November 28, 2005 with the Canadian Radio-television and Telecommunications Commission's ("CRTC").
2. The attached report and schedules are in response to the CRTC's original request for an investigation into an alleged incident of disclosure of telephone subscriber information, as reported in Maclean's magazine on November 14th, 2005, as well as current and additional safeguards recently put in place.
3. Please be advised that this response is on behalf of both RWP, as well as FIDO Inc.
4. Rogers requests that the Commission treat the enclosed information as confidential, pursuant to section 20(1)(b) of the Access to Information Act, and sections 38 and 39 of the Telecommunications Act. This information refers to the methods and procedures used by Rogers to preserve and protect its customers' personal information. For both competitive and security reasons, Rogers would never publicly disclose the information contained in the document and hence the details and specifics regarding the changes we have made have been kept largely confidential. Release of these details could enable parties engaged in fraudulent activities to amend their own tactics to attempt to gain access to information. Rogers submits that any possible public interest in disclosure of the confidential information is greatly outweighed by the specific direct harm that would flow to Rogers and its customers.

Yours truly,

Dawn Hunt
DH/csh
Attachs.

ABRIDGED
Report to the CRTC

A) Background

On November 14th, 2005 Maclean's Magazine reported it was able to obtain call detail records of Canadian telephone subscribers. Using a U.S. based data broker called locatecell.com, the magazine alleges to have acquired the call details of the Privacy Commissioner, Jennifer Stoddart, as well as those of an "editor" of Maclean's, a FIDO subscriber.

B) FIDO investigation

While the Maclean's article detailed the name of the individual in the case of both Bell and Telus, that information was not disclosed as it related to the FIDO customer. Specifically, the Maclean's article states at page 27;

"(In a test run, the company was also able to obtain the cell records of a senior *Maclean's* editor from FIDO, a division of Rogers, the company that owns this magazine.)"

Given no further details were provided regarding this person, we contacted the author of the Maclean's article, Jonathon Gatehouse, and requested the name and the cell phone number of the person referred to in the above noted paragraph. Mr. Gatehouse would not release the name of the person to us,

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FIDO is therefore unable to provide any further insight into this specific incident without further information regarding this editor.

C) Data Brokers

Data brokers such as locatecell.com have been operating in the United States for some time. Our understanding of their operations is that, in return for fees, the firms offer to provide the customer information of any phone number in North America. For example, locatecell.com currently offers the following services (Please see Schedule "A"):

- Reverse Cell Phone Number Lookup – Finds the name and address for any cell phone number provided to them.
- Find Current Cell Phone Number – Finds the cell phone number for any name plus address or social security number provided to them.
- Cell Phone Records – Provides the call details for any cell phone number provided to them.

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There are three possible methods that the data brokers could employ to illicitly obtain customer information. The brokers could either:

- 1) hire an employee who has access to customer records;
- 2) access the IT system; or
- 3) impersonate the actual customer.

These methods are all obviously fraudulent and involve misrepresentation.

D) RWP's Investigation

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E) Accessed information

At no time were the data brokers able to access confidential credit information.

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Confidential Information such as credit card numbers, social insurance numbers, driver license numbers and bank account numbers are always protected.

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F) Audit of Rogers ID Validation Processes

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G) Countermeasures

As a result of our own audit, Rogers has implemented several countermeasures to prevent data brokers from obtaining call detail records.

In directives issued November 11th, 2005 to all Wireless and Common Call Centre CSRs, as well as Account Receivable CSRs, (See Schedules "E" and "F"), Rogers has made significant changes to its validation processes. Specifically, Rogers instituted the following:

1.

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2. Additional Pieces of Identification

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In addition, changing the mailing address will require

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Report to the CRTC

3. Call Details

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4. Passwords - Passwords for customers were already in place for customers requesting them. They will continue to be offered to Rogers' subscribers. Once password protected, an account may not be accessed without it.

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5. Prohibition on Volunteering Information

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6. Improved CSR Training and Instruction - Rogers has re-emphasized the priority of customer confidentiality in its call centres. Each CSR has been provided a copy of the November 11th directive and, to underscore the importance that the company places on it, each CSR has been required to sign a copy.

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7. Notice to Retail Outlets - In a Sales Bulletin dated November 14th, 2005, all dealers and corporate stores were instructed that a customer visiting in person must validate their identification. Please see Schedule "G".

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As a result, Rogers' and Fido's validation process will now follow the guidelines listed in the column labeled "Post-Investigation" in Schedule "D"

H) Additional Information

The measures taken to date do not completely capture Rogers' efforts to secure our subscribers' personal information. Our efforts are ongoing and in that regard, RWP has also engaged

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Cell Phone Number Research

All Search Results:

- 1 to 4 hours during business days on orders received by 5pm
- Guaranteed to be accurate, and current
- No data returned, No Charge for the Search



Reverse Cell Phone Number Lookup \$65

Find Name and Address from number. Additional Cell Reverses available including Canadian Cell \$85, and International Cell \$250.



Find Current Cell Phone Number \$95

Give us the name and any combination of address or SSN and we will send you the working cell phone number.



Cell Phone Call Record \$110

Give us the cell phone number and we will send you the calls made from the cell phone number.

[Home](#) | [Cellular Trace](#) | [Land Line Trace](#) | [Site Map](#) | [Contact Us](#)

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**Schedule "B"
CSR Notes # C**

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Schedule "D"

Rogers Revised Validation Methods

	Pre-Investigation	Post-Investigation
Distribution of Call Details	# C	# C
ID Validation: IVR	# C	# C
ID Validation: CSR	# C	# C
Website	# C	# C

Fido Revised Validation Methods

	Pre-Investigation	Post-Investigation
Distribution of Call Details	# C	# C
ID Validation: IVR	# C	# C
ID Validation: CSR	# C	# C
Website	# C	# C

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ABRIDGED
REPORT TO THE CRTC
Schedule "E"



To: All Wireless and Common Customer Care Employees

From: # C

Date: November 11, 2005

Re: Additional Customer Protection Initiatives

Consumer privacy protection is a very important issue for Rogers and as a company, we take significant precautions to safeguard our customers' personal information. For this reason, we have taken specific note of recent incidents in which a number of US-based companies have been reported to offer the account level call details for any customer using a North American landline or wireless carrier for a specified fee. The criminal activity that these companies engage in may be accomplished by fraudulently representing themselves as an individual customer when contacting a phone company. To further protect our customer's personal information in light of these recent reports, we will implement the following measures effective immediately:

Customer Verification

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Password Protection

If your customer does not have a password and is interested in establishing one, please update their account accordingly.

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Documentation Requests (i.e., invoice, contract)

Please apologize for inconvenience this may cause

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If customers have questions or comments about these incremental security measures,

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in executing these changes, your quality guidelines and to reflect and include these additional security measures.

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To support you have been updated

Thank you in advance for your co-operation in helping to maintain the security of our customer information.

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2/Additional Customer Protection Initiatives

**ABRIDGED
REPORT TO THE CRTC
Schedule "E"**

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What can I do about protecting myself further?

All customers must be vigilant and take steps to protect their private information from fraud and other criminal activities.

All Rogers customers have a password option available and if you are interested, we will place one on your account.

Please visit the Canadian Consumer Information Gateway at <http://consumerinformation.ca> for more information.

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I have read and understand the above memo.

Please print and sign your name

ABRIDGED
REPORT TO THE CRTC
Schedule "F"



To: All Accounts Receivable Employees
From: # C
Date: December 8, 2005
Re: Additional Customer Protection Initiatives

Consumer privacy protection is a very important issue for Rogers and as a company, we take significant precautions to safeguard our customers' personal information. For this reason, we have taken specific note of recent incidents in which a number of US-based companies have been reported to offer the account level call details for any customer using a North American landline or wireless carrier for a specified fee. The criminal activity that these companies engage in may be accomplished by fraudulently representing themselves as an individual customer when contacting a phone company. To further protect our customer's personal information in light of these recent reports, we will implement the following measures effective immediately:

Customer Verification

C

Password Protection

C

If your customer does not have a password and is interested in establishing one, please update their account accordingly.

Documentation Requests (i.e., Invoice, contract)

C

Please apologize for any inconvenience this may cause.

If customers have questions or comments about these incremental security measures,

C

To support you in executing these changes, your quality guidelines, # C
will be updated to reflect and include these additional security measures.
Thank you in advance for your co-operation in helping to maintain the security of our customer information.

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Schedule "F"**

2/Additional Customer Protection Initiatives

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What can I do about protecting myself further?

All customers must be vigilant and take steps to protect their private information from fraud and other criminal activities.

All Rogers customers have a password option available and if you are interested, we will place one on your account.

Please visit the Canadian Consumer Information Gateway at <http://consumerinformation.ca> for more information.

C

I have read and understand the above memo.

Please print and sign your name

SALES BULLETIN

Start Date:	IMMEDIATE	Final #
End Date:	N/A	
Regions:	National	
Distribution:	Rogers™ Plus Mall Stores	Retailers
	Rogers™ Wireless Authorized Dealers	Flagship Stores
	Rogers™ Wireless Authorized Agents	

Rev. 3/5/04

Important – Customer Protection Initiatives

Consumer privacy protection is a very important issue for Rogers and we take significant precautions to safeguard our customers' personal information. For this reason, we have taken specific note of recent incidents in which a number of US-based companies have been reported to offer the account level call details for any customer using a North American landline or wireless carrier for a specified fee. The criminal activity that these companies engage in may be accomplished by fraudulently representing themselves as an individual customer when contacting a phone company. To further protect our customer's personal information in light of these recent reports, we have implemented the following measures effective immediately:

Customer Verification:

is in person, request valid (see Sales Bulletin #2005-07-02) if the interaction #C
#C

Call Centre for assistance. please direct the customer to contact Rogers' #C

Password Protection:

C If the customer does not have a password and is interested in establishing one, please advise them to contact Rogers' Call Centre to update their account accordingly. #C

PLEASE POST FOR YOUR STAFF



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Schedule "G"**

Documentation Requests (i.e., invoice, contract):

#C

other addresses.

Rogers' policy is that we do not mail invoices to any

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C To support you in executing these changes, the Rogers Call Centres have been updated with the same information and made any applicable business process upgrades.

Thank you in advance for your co-operation in helping to maintain the security of our customer information.

Frequently Asked Questions

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- Q. What can I do about protecting myself further?**
A. All customers must be vigilant and take steps to protect their private information from fraud and other criminal activities. All Rogers customers have a password option available and, if you are interested, the Rogers Call Centre can place one on your account.

Please visit the Canadian Consumer Information Gateway at <http://consumerinformation.ca> for more information.

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