

Safe Connections Act Compliance Policy

Last Updated: July 11, 2024

1. Abstract The Safe Connections Act (“SCA”) is a federal law designed to assist survivors of domestic abuse. This law requires the FCC to implement the SCA. The SCA mandates telecommunications providers to allow survivor(s) to separate their mobile phone lines from a shared mobile service contract or plan, even if they are not the primary account holder. The SCA aims to empower survivors by facilitating access to independent communication services. In accordance with the SCA, United’s SCA policy will take effect beginning July 15, 2024.

2. Purpose This policy outlines United Telephone Association, Inc.; United Communications, Association, Inc.; and United Wireless Communications, Inc.’s (“United”) procedures for assisting survivor(s) of domestic abuse (“survivor,” “survivors”) in accordance with the FCC's Safe Connections Act.

3. Scope This policy applies to all survivor(s) who are customers of United and are seeking to separate their mobile phone line(s) from a shared mobile service contract or plan that is shared with an abuser.

4. Procedures for Line Separation

4.1 Eligibility and Request Process

- The FCC defines “survivor” as an individual who is not less than 18 years old and either (1) against whom a covered act has been committed or allegedly committed; or (2) who cares for another individual against whom a covered act has been committed or allegedly committed (provided that the individual providing care did not commit or allegedly commit the covered act).
- The FCC defines “abuser” for purposes of SCA rules as an individual who has committed or allegedly committed a covered act against (1) an individual who seeks relief under section 345 of the Communications Act and the Commission’s implementing rules; or (2) an individual(s) in the care of an individual who seeks relief under section 345 of the Communications Act and the Commission’s implementing rules, mirroring the substance of the SCA.
- Survivor(s) requesting to separate their mobile phone line(s) must submit a line separation request (“request”) online via United’s website or in person at a United retail store location.
 - A line separation request being made under the purview of the SCA must: (1) state that the survivor is requesting relief from the covered provider under section 345 of the Communications Act and the FCC’s rules; (2) identify each line that should be separated using the phone number associated with the line; (3) regardless of which lines will be separated, identify which line(s) belong to the survivor or individual(s) in the care of the survivor and state that the survivor or individual(s) in the care of the survivor is the user of those line(s); (4) when a survivor is seeking separation of the line(s) of any individual under the care of the survivor, include an affidavit setting forth that any such individual is in the care of

the survivor and is the user of the specific line(s); (5) when a survivor is seeking separation of the abuser's line, state that the abuser is the user of that specific line; and (6) include documentation that verifies that an individual who uses a line under the shared mobile service contract or plan (i.e., an "abuser") has committed or allegedly committed a covered act against the survivor or an individual(s) in the survivor's care. The request must also include the name of the survivor and the name of the abuser that is known to the survivor.

- When a survivor is seeking a line separation for an individual(s) in the care of a survivor, the request requires the survivor to submit an affidavit that is signed by the survivor and dated near the time of submission.
- As part of the request, the survivor is required to submit documentation that verifies that an individual who uses a line under the shared mobile service contract or plan has committed or allegedly committed a covered act against the survivor or an individual(s) in the survivor's care (i.e., is an "abuser").
 - To meet the requirement for demonstrating survivor status, survivors must submit one or more of the eligibility documents prescribed by the SCA:
 1. a copy of a signed affidavit from a licensed medical or mental health care provider, licensed military medical or mental health care provider, licensed social worker, victim services provider, licensed military victim services provider, or an employee of a court, acting within the scope of that person's employment; or
 2. a copy of a police report, statements provided by police, including military or Tribal police, to magistrates or judges, charging documents, protective or restraining orders, military protective orders, or any other official record that documents the covered act.
 - The documentation provided should clearly indicate a known name for the abuser and the survivor, as well as include some kind of affirmative statement that constitutes an indication that the abuser actually or allegedly committed an act that qualifies as a covered act against the survivor or an individual(s) in the care of a survivor.

4.2 Processing of Request

- Upon receiving a request for a shared mobile service contract or plan where a survivor(s) and abuser each use a line, United will separate the line(s) of the survivor and the line(s) of any individual(s) in the care of the survivor from the shared mobile service contract or plan or separate the line(s) of the abuser from the shared mobile service contract or plan as soon as feasible but no later than the close of two business days after receiving a completed line separation request from a survivor or the designated representative of the survivor. Business days are Monday-Friday, 8:00 a.m. to 5:00 p.m., excluding holidays.
- The request, as well as any documentation or any documentation or information a survivor or the designated representative of the survivor submits as part of a line separation request, will be handled with strict confidentiality. United will not disclose or permit access to information provided in the request unless subject to a valid court order, except: (1) to the individual survivor or designated representative of the survivor submitting the line separation request; (2) to anyone that the survivor specifically

designates; (3) to those third parties necessary to effectuate the request (i.e., vendors, contractors, and agents); and (4) to the extent necessary, to the Commission and the Universal Service Administrative Company (USAC) to process emergency communications support through the designated program or address complaints or investigations.

- Consistent with the SCA, United will dispose of the information submitted as part of a line separation request not later than 90 days after receiving it.

4.3 Miscellaneous

- Any previously accrued arrears on an account following a line separation will stay with the person who was the primary account holder prior to the line separation.
- When submitting a line separation request, survivors (or their designated representatives) may indicate their service choice from among all commercially available plans United offers from which they are eligible.
 - For current information about United's Single-Line and Multi-Line Postpaid Plans, visit: <https://getunited.com/wireless/unlimitedplans/>.
 - For current information about United's Prepaid Plans, visit: <https://getunited.com/wireless/prepaidplans/>.
- Once the line separation request has been completed, the owner of the account to which the line(s) have been separated will be subject to United's terms and conditions.
- United will not make a line separation conditional upon the imposition of penalties, fees, or other requirements or limitations.
- The Lifeline program is a source for emergency communications for qualifying survivors. For a description of who might qualify for the Lifeline program, information on how to participate, and information for the Affordable Connectivity Program (or other successor program) for which the survivor may be eligible due to their survivor status, please visit <https://www.lifelinesupport.org>.

5. Awareness and Support

5.1 Public Awareness

- United will publish a landing page on its website's Consumer Information & Legal page with details of the SCA and a form for submitting a line separation request.

6. Record Keeping and Reporting

6.1 Compliance Records

- United will maintain records of all requests and actions taken under the purview of SCA.
- These records will be kept confidential and used solely for compliance and reporting purposes, and will be retained and disposed of according to FCC rules.

6.2 Reporting

- United will report on its compliance with the Safe Connections Act requirements if mandated by the FCC.

7. Designated Personnel

7.1 SCA Response Team

- The **SCA Response Team** is comprised of United personnel who are responsible for handling line separation requests and ensuring that all requests are processed promptly and confidentially.
- Questions related to the SCA or line separation requests should be directed to the SCA Response Team.

Contact Information

If you have questions about United's compliance with the SCA, please contact United's SCA Response Team at 620-227-8641 or visit the SCA landing page at <https://getunited.com/consumer-info-legal/safe-connections-act/>.