

GUIDANCE FOR LAW ENFORCEMENT

Comcast is often asked to assist state and federal law enforcement agencies and government entities in their criminal or administrative investigations, and we do so while protecting subscriber privacy as required by law and our subscriber privacy policies. In order to obtain Comcast subscriber information, law enforcement agencies and government entities must provide Comcast with a valid legal request appropriate for the matter or responsive information will not be released.

Comcast reviews and evaluates each request on a case-by-case basis and considers any special procedural or legal requirements or applicable laws while protecting and maintaining the privacy of our subscribers, business information, and records. Unless a lawful request or court order explicitly directs Comcast not to do so, Comcast may provide information to a subscriber regarding government requests for information about that customer in advance or if the customer makes a verified written request to Comcast seeking information about government requests for the subscriber's data or records. **Your request must include a non-disclosure statement directing Comcast not to disclose the request's existence to the customer** to prevent potential notification to a customer about the existence of a government request or court order.

LEGAL RESPONSE CENTER

Comcast's Legal Response Center ("LRC") responds to valid legal requests from state and federal government entities and law enforcement agencies for information and records relating to Comcast residential and commercial subscribers.

How To Submit A Request

Online Portal https://lea.comcast.com <ul style="list-style-type: none"> Registration required Help? Call 866-947-8LRC 	Mail* Legal Response Center 1800 Bishops Gate Blvd. Mount Laurel, NJ 08054	Fax* 866-947-5587	Email* LEASubmit@comcast.com
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Where there is an **emergency** involving danger of death or serious physical injury, Comcast will expedite release of subscriber information without legal process. Proper legal process must be submitted within a reasonable time after the emergency has subsided. Contact the LRC's emergency number (877-249-7306) to initiate release of records and provide the relevant facts and circumstances of the emergency.

*Include a cover letter/page with your contact information and any relevant information. No cover letter is required for requests made through the online portal or emergency disclosure requests.

TYPES OF LEGAL REQUESTS

Court Orders. A court order must be signed by a judge, indicating that the law enforcement officer or government entity has made the requisite showing required under the law that the records requested are relevant and material to an ongoing investigation. Pursuant to applicable law, Comcast does not provide any content (text messages or email), cell site location information ("CSLI") or details on the selection of video programming to law enforcement in response to a court order. Certain content requires a warrant as does CSLI. A wiretap, pen register, or trap and trace all require a court order.

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Subpoena. A government entity or law enforcement official may issue a subpoena to seek evidence relevant to the investigation of a possible crime. This can include a state or federal Grand Jury, trial, or statutorily authorized administrative subpoena. 18 U.S.C. 2703(c)(2)(A)-(F) limits the types of information that can be released in response to a subpoena:

- Customer name and address, including email addresses
- Call detail and record of internet usage (session times and duration; bandwidth usage)
- Length of service and types of service
- Telephone or other subscriber account identifying numbers, including IP addresses
- Payment records, including means and methods of payment

Warrants. Warrants require a government entity or law enforcement agency to demonstrate that there is “probable cause,” or a reasonable belief that the person whose records are being sought has committed, is committing, or is about to commit a crime. A warrant may be used to obtain stored content as well as more basic subscriber or transactional information. Stored content refers to communications or data that subscribers create and store through their Comcast services such as email, photographs, and home security video. Certain state laws may also impose warrant requirements on or limit disclosure of certain subscriber data or records.

Consent from Subscriber. Law enforcement may obtain subscriber records upon showing that lawful consent was obtained from the subscriber.

Child Exploitation. Lawful demands for subscriber information that relates to the exploitation of children are prioritized. To provide a faster response, the demand must state that the matter involves or potentially involves the exploitation of children. Comcast will make information available to the National Center for Missing and Exploited Children as required by 18 U.S.C. 2258A.

FISA. 50 U.S.C. 1801-1862 and U.S.C. 2511 submissions to Comcast should be coordinated with the applicable FBI field office. A Special Agent or other authorized FBI employee must hand deliver the request to Comcast.

Pen Register/Trap and Trace Device. 18 U.S.C. 3123 provides a mechanism for authorizing and approving the installation and use of a pen register or trap and trace device pursuant to court order. All orders must be coordinated with the LRC for implementation.

National Security Letters. Delivery of all National Security Letters should be coordinated through the FBI field office in Washington D.C. and delivered to Comcast.

Wiretaps and Interception of Communications. 18 U.S.C. 2511 provides a mechanism for authorizing and approving the interception of a wire, oral, or electronic communication pursuant to court order. All such orders must be coordinated with the LRC prior to submission to Comcast.

Note: Comcast, as a cable operator, is prohibited by 47 U.S.C. 551(c)(2)(D) from providing any information or records to state and federal law enforcement agencies and government entities revealing cable subscriber selection of video programming in response to a warrant, court order, or subpoena under the provisions above, and can only provide such in response to a specific court order that complies with 47 U.S.C. 551(h) unless the subscriber has consented. Please contact us for details.

Civil Matters. Submissions of legal requests for civil matters must be served through Comcast’s registered agent, CT Corporation, in the relevant state. Attorney-signed subpoenas are insufficient when seeking any subscriber information or records; Comcast must receive a judge-signed court order providing for notice to the subscriber and an opportunity to challenge any disclosure before releasing subscriber information in a civil matter. All records in

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such instances are deemed confidential and limited to use in litigations. For CT Corporation locations, click here (<https://ct.wolterskluwer.com/sop-locations>) or call 866-925-9916

WHAT WE CAN PROVIDE

Telephone Numbers

Comcast can provide certain account information when provided with a landline, VoIP, or mobile telephone number it currently or has historically served or included as a subscriber contact number.

Xfinity Mobile

Confirm with Neustar (<https://www.neustar.biz/>) that the mobile telephone number is assigned to Xfinity Mobile – results will show as “CELLCO PARTNERSHIP DBA – VERIZONWIRELESS – PA.” Verizon does not maintain Xfinity Mobile subscriber information.

Comcast can provide a Xfinity Mobile customer’s billing information such as name, address, and the device used, plus call detail records and text message details (date, time, and recipient telephone numbers) and means and method of payment. Text message content (if available) must be sought from Verizon. Verizon maintains responsibility for CALEA surveillance, pen register/trap and trace, SMS content, video, images, CSLI, and geolocation services for Xfinity Mobile customers.

Xfinity Voice

When provided with a Xfinity Voice (VoIP) telephone number, Comcast can provide subscriber and billing information, call detail records, and support CALEA surveillance, pen register, and trap and trace requests.

Internet Protocol (IP) Addresses

Please confirm that the IP address is assigned to Comcast by running a query at <http://www.ip2location.com/free.asp>. Comcast’s residential subscribers are not assigned a constant or static IP address, but rather are assigned a dynamic IP address. It is therefore necessary that all requests for subscriber information based on an IP address include the specific date, time, and time zone for which information is sought. IP address logs are retained for 180 days. Comcast uses Carrier Grade Network Address Translation (“CGN”) for IPv4 Wi-Fi addresses, so any request for subscriber data associated with a Xfinity Wi-Fi IP Addresses must also include the source port number of the IP address for full identification capability.

Email Addresses

Residential Accounts

Residential email address accounts issued through Xfinity Internet end in comcast.net (i.e., JohnDoe@comcast.net). If an email account ends in any other domain (e.g., @gmail.com or @yahoo.com), Comcast will not have information regarding the email address. Xfinity Internet customers are provided with or can create their own email address, which Comcast will maintain even after Xfinity Internet service is cancelled or terminated. Email content can only be provided in response to a valid state or federal warrant.

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Commercial Accounts

Requests for Comcast Business subscriber information must be emailed to Microsoft at uslreq@microsoft.com or faxed to (425) 708-0096. Comcast does not maintain information or content for any business email addresses.

Other Comcast Products and Services

Our Law Enforcement Portal has detailed information about retention periods for each type of customer information we maintain. If you do not have access to the portal, please call the LRC at 866-947-8LRC for retention information.

WHAT TO INCLUDE

Requests should include the street address, account number, phone number, email address, or other identifiable information about the subscriber.

Names. Comcast responds to requests for identification based on a name exactly as it is written on the request. For example: if the request asks for information relating to James Doe in Springfield and Comcast's records reveal a J. Doe or Jim Doe in Springfield, Comcast will require additional legal process to determine if it has responsive information. If initial or nicknames are used, include all variation of the subject's name

Addresses. Requests based on an address must include the full street address, including the house or apartment number, street name, city, state, zip, and specific period covered (subscribers at an address may change).

Account Numbers. Incomplete account numbers cannot be processed.

Financial Information. Requests must include a complete credit card number, the date the payment being referenced was processed, the amount of the payment, and the card issuer. Requests involving a bank account must include the account and routing numbers.

Payment History. Requests must include the date, amount of payment(s), the account number used to make the payment(s) or if cash was used. If a request seeks information about how a payment was made (i.e., in person, at a store, or over the phone), it should specifically request such information.

PRESERVATION REQUESTS

If an agency is in the process of obtaining a legal request, it may request that subscriber information at the LRC be preserved beyond its normal retention period. Information responsive to the preservation request will be retained for 90 days, after which if no valid legal request is made or no 90-day extension is sought, the information may be deleted in accordance with our retention periods. The 90-day extension must be received prior to the expiration of the initial period. The use of successive or daily preservation requests on an ongoing basis to preserve evidence will not be honored. If law enforcement or an agency seeks real-time data after submitting a preservation request, a valid wiretap or pen register/trap and trace order must be presented rather than successive preservation requests.

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COSTS

Comcast reserves the right to seek reimbursement for processing and responding to legal process as permitted by law. Our policy is to discuss reimbursement with you before we incur any costs (except in emergencies). Stored record disclosures generally do not incur charges unless lengthy. Wiretaps and pen register/trap and trace orders require a substantial commitment of Comcast's resources.

Pen Registers/Traps/Wiretaps. \$1,000 for initial set-up (including the first month of intercept service or any part thereof) and \$850 for each subsequent month or any part thereof in which the order or any extensions are active.

Special Technical Support. \$500 upon implementation that spans the authorized period of each new or renewed order and is charged at the beginning of each new or renewed authorized period. Stand-alone email collections (header information and/or full content) will be charged in the same manner. Requesting agencies must complete a CALEA worksheet providing detailed billing information and authorized point(s) of contact. Billing will occur either monthly or at 60-day intervals, depending on the volume.

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