



## CVFiber Policy Committee Meeting Minutes

**Tuesday, Dec. 6, 2022 5:00 PM - 6:00 PM**  
**Virtual meeting**

**Present:** Allen Gilbert (Worcester), Linda Gravel (Waterbury), John Morris (Marshfield), Ray Pelletier (Northfield), and Siobhan Perricone (Orange); and Jennille Smith, executive director. **Absent:** Alexis Julian (public member).

1. **Call to order.** A quorum being present, the special meeting was called to order at 5:03 p.m. by Gilbert, chair.
  
2. **Changes to agenda.** There were none.
  
3. **Public comment.** There was none.
  
4. **Approval of Sept. 29, 2022 draft meeting minutes.** Gravel moved, Perricone seconded, to approve the minutes as presented. Approval unanimous.
  
5. **Privacy policy – Check-in regarding CrowdFiber privacy policy, status of adding safety issues to our privacy policy, other possible revisions to Perricone draft.** Gilbert explained the small changes he was suggesting to the policy developed by Perricone. What was meant by information needed for “directories” prompted discussion; it was felt personal information may be needed for directories related to VOIP (voice over internet protocol) services CVFiber will be offering. Gilbert suggested the language be shortened to say that we will release customer information if CVFiber is “allowed or required by law to provide directory publishers with phone customers’ listing information” (deleting “including name, address, and phone number for purposes of publishing and

delivering directories”). Morris suggested dropping “allowed,” as that suggests CVFiber would have broad discretion in releasing personal information. With no objection, “or allowed” was dropped.

Gravell asked if we had looked at CrowdFiber’s Privacy Policy and saw any problems with it. Smith said we had, she brought it to CrowdFiber’s attention, they agreed there was language that should be changed and agreed to do so. The change hasn’t yet been made, though, Smith noted, despite efforts to get them to make the change. She noted that there were also bugs in the registration program that also needed to be worked out. Gravell asked if these problems were show-stoppers to potential subscribers accessing CrowdFiber’s data services. Smith said the problems were troubling and she wished CrowdFiber would fix them. Gravell suggested we apply a little pressure. Gilbert suggested Smith tell CrowdFiber that the CVFiber committees working on policies and data access would like to see the problems addressed before Christmas – say, by Dec. 20, two weeks from today. Ask for their action as a boost, a present, that we’d appreciate, he said. Smith agreed it might be a way to encourage a resolution. Smith would like our subscriber portal to go live by Christmas. Perricone noted that CrowdFiber’s Privacy Policy goes very deep, is very detailed, while ours is more general. She’s convinced the specific language in CrowdFiber’s Privacy Policy that we’re objecting to was a mistake and they will fix it. She’s not sure this is a reason to not move forward. Our policy makes very clear our intent to protect people’s privacy.

Gravell asked what the process is for approving our policy. Gilbert explained that the committee needs to be aware of all the materials that she (Gravell), Healy, and Smith are currently working on and hope to have in place soon; the CVFiber Privacy Policy will be part of those materials, and so the policy needs to be completed. Gravell said that wasn’t an answer to her question and asked again what the approval process is. Gilbert explained that usually, policies have been reviewed by the Executive Committee before going to the Governing Board for adoption. But he said that some policies had gone straight to the Governing Board. He suggested that if we’re hoping to fast-track this policy so it’s approved before we start signing up customers, we should send the policy to the Governing Board for its approval, and let it decide if it wants further review and discussion by the Executive Committee. Essentially, we’d be giving the Governing Board a chance to have the policy in place by next week. Gravell said her goal is not to go live before we have the necessary policies in place and “up and ready” on our website. Gilbert said the idea in developing the policy was to keep it short and concise, and to refer to broader documents such as our subscriber agreement (which is being modeled on the WCVT agreement, since they are our operator) for details. Gilbert then moved to approve the Privacy Policy, developed by Perricone and revised to accommodate the small edits he had suggested and were presented tonight, and that we recommend the policy for approval by the Executive Committee. Gravell seconded the motion.

More discussion followed. Pelletier suggested amending the first sentence of the policy, from the current “This privacy policy is for CVFiber and covers all member towns within its communications union district” to “This privacy policy is for the CVFiber Communications union district and the CVFiber Community Network. Questions were asked, and much discussion ensued, about capitalization of certain words (specifically, “Community Network”), with Pelletier eventually offering that Gilbert resolve capitalization discrepancies as he sees fit. Gravel, who had seconded Pelletier’s proposed amendment, agreed to changes of Pelletier’s amendment. Gilbert who had offered the motion to adopt the policy, said he accepted the amendment to amend, and asked if there was any more discussion about the motion to send the Privacy Policy to the Governing Board for its approval and adoption. Morris pointed out that Gilbert had said in his original motion that the policy be sent “to the Executive Committee.” Gilbert recognized that as a mistake, and offered a friendly amendment to the motion, so it read “Move that the Policy Committee approve the draft Privacy Policy and send it to the Governing Board for its review and possible adoption.” Gravel seconded the amended motion. There was no further discussion. Approval was unanimous; Pelletier abstained from the vote, saying the policy “needs work” after Gilbert asked if he wanted to give a reason for his abstention. Gravel asked that Gilbert put out a final version of the policy, with no red marks, and with the revision date. Gilbert said he would include the final version in the meeting minutes.

**6. Review of status of other outstanding policies or core documents.**

Gilbert asked Smith to describe the work being done by her along with Gravel and David Healy around documents. Smith explained that because WCVT recently had its documents reviewed and revamped and because WCVT will be our operator, the group is largely using WCVT’s documents as starting points for our documents. Documents from ECFiber are also being checked to make sure we don’t miss anything else that’s important to our work as a CUD. She noted that the documents fall into two broad categories – policies and operational documents. We’ll need to have legal review of most of the documents. Gravel and Smith noted that the information will be uploaded to our website. Morris stressed the need for straightforward one-paragraph explanations.

CrowdFiber is building the data side of collecting names and information for people who want to subscribe to our services, but all access will be through the CVFiber website. CrowdFiber is simply an interface to a database developed by CrowdFiber, Smith explained. The user will have a seamless connection from the CVFiber website to the CrowdFiber system, Gravel said. The point is to make the transition smooth. Gravel mused that maybe we should do a demo for the Governing Board, but noted the system has to be close to being operational-ready before we can do this; Smith thought this was a great idea. Gravel then asked Smith if the only

documents still needed to go live are the Privacy Policy and the Subscriber Agreement. Yes, basically, she said, pointing out that another important one is an acceptable use policy, which she said had already been adopted. The plan is to have all documents, whether policy or operational documents, posted on the “Documents” section of the website. “The website is our public facing,” Gravell said, “and we want to be sure we have the necessary documents up there.” Gravell thinks we’ll be swamped once the material is posted. Gravell thanked everyone for the hard work helping to develop the Privacy Policy.

**7. Tracking volunteer hours spent on CVFiber work – continuation of discussion.** Item again tabled due to lack of time for discussion.

**8. Other business.** There was none.

**9. Adjourn.** The meeting adjourned at 6 p.m.

*-- Allen Gilbert*

**Approved March 1, 2023**

## **Attachment**

### **CVFiber Privacy Policy**

*As revised and approved by CVFiber Policy Committee 12-6-22*

This privacy policy is for the CVFiber Communications Union District and the CVFiber community network.

CVFiber is a nonprofit municipal entity, and as such we work continuously to respect our customers’ desire for privacy. We collect and use individual customer information to perform our daily business of providing internet service. Any information collected is used for the purpose of providing our customers with the best service possible. We may also use customer information to protect customers,

employees and property against fraud, theft or abuse and to maintain good customer relations.

We do not sell personal information to anyone. All information obtained through the use of our website is used for internal purposes only.

We do not release customer information to third parties except as required by law or to protect the safety of customers, employees or property. Some examples include:

- We are required to release the information if served with valid legal process.
- We are required by law to provide directory publishers with phone customers' listing information.

We strive to ensure that the information we obtain and use is accurate. Customers who find an error in their bills are encouraged to notify us.

Our employees are responsible for safeguarding individual customer information and communications. All personnel are aware of and protect the privacy of all forms of customer communications and information. Employees who fail to follow safeguards face disciplinary action.