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April 6, 2017

VIA EMAIL

Iowa Attorney General Tom Miller
Consumer Protection Division
1305 E. Walnut Street
Des Moines, IA 50319
consumer@iowa.gov

Re: Notification of Security Breach

Dear Attorney General Miller:

Pursuant to Iowa Code Chapter 715C, I am writing on behalf of Great Lakes Communication Corp. d/b/a IGL TeleConnect (“GLCC”), to inform you of a recent security breach incident involving personal information of Iowa residents.

GLCC is an Iowa-based competitive local exchange carrier that provides telecommunications services to Iowa residents and other clients.

On March 20, 2017, GLCC discovered that it was the victim of a sophisticated cyber-attack that compromised personal information of 2,960 Iowa residents.

Description of the Security Breach

On March 20, 2017, GLCC discovered that it was the victim of a sophisticated cyber-attack that was performed by a professional hacker who installed custom kernel-level and user-land backdoors on certain GLCC computing systems.

Due to this event, the following personal information of Iowa’s residents might have been compromised: telecommunications subscriber records, Social Security Numbers, Credit Card numbers, bank account numbers.

Steps Taken by GLCC

GLCC has taken significant steps to resolve this issue and strengthen the security of its network.

First, GLCC notified us as outside legal counsel. We assisted GLCC in identifying and retaining the nation’s leading technical consultants and forensic investigators to determine what happened and what information was affected. Secondly, with the assistance of these professionals, GLCC has been working closely with federal law enforcement to investigate this incident. In connection with third-party cyber security professionals, GLCC continues to monitor its network for any additional unauthorized intrusions.

GLCC is providing notice of this incident to the potentially impacted Iowa residents who are clients of GLCC, in substantially the same form as the letter attached hereto as **Exhibit A**. Likewise, GLCC is paying for and offering its customers LifeLock's identity theft protection service, which is a proactive, alert based, solution designed to detect fraudulent applications so that they can be stopped before a credit profile is affected.

GLCC is also providing potentially impacted individuals with helpful information on other ways to protect against identity theft and fraud, including how to place a fraud alert and security freeze on their credit files, the contact information for the national consumer reporting agencies, how to obtain a credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, state attorney general, and law enforcement to report attempted or actual identity theft and fraud.

Should you have any questions or need further information, please do not hesitate to contact me.

Sincerely,



G. David Carter

Counsel to Great Lakes Communication Corp.



1501 35th Avenue West | Spencer, Iowa | 1-800-281-1072

4/7/2017

Re: Notification of Security Breach

I am writing to all of our valued current and previous customers to inform you of a cyber security incident that occurred on March 20, 2017 and which, unfortunately, may have compromised your personal information.

WHAT HAPPENED? Despite considerable investment made in technology to keep our data systems safe and secure, Great Lakes Communication Corporation d/b/a IGL TeleConnect discovered that it was the victim of a sophisticated cyber-attack on March 20, 2017, which may have contributed to the network disruptions that occurred on April 3, 2017. Our investigation, while ongoing, leads us to believe that the attacks were performed by a professional hacker who has targeted several other businesses in the United States. The hacker utilized custom kernel-level and user-land backdoors to obtain access to certain GLCC computing systems.

WHAT INFORMATION WAS INVOLVED? Due to this event, the following personal information of our customers may have been compromised: telecommunications subscriber records, Social Security Numbers, credit card numbers, and bank account numbers.

WHAT ARE WE DOING? As soon as we discovered the problem, we immediately began implementing our data breach security protocols to contain and resolve this issue.

First, we notified our legal counsel who assisted us in identifying and retaining the nation's leading technical consultants and forensic investigators to determine what happened and what information was affected. Secondly, with the assistance of these professionals, we have been working closely with federal law enforcement to investigate this incident. Rest assured that IGL TeleConnect will cooperate with law enforcement to the fullest extent possible in order to bring these criminals to justice.

In connection with third-party cyber security professionals, we continue to monitor our network for any additional unauthorized intrusions. After consultation with law enforcement, we have concluded that we can now provide this notice to affected customer without jeopardizing the on-going investigation.

We understand that the safety and security of your personal information is of utmost importance and apologize for the inconvenience that this breach causes to each of our valued customers.

In order to address the inconvenience, and to protect each of our customers, we will pay for each of our customers to obtain LifeLock's identity theft protection service, which is a proactive, alert based, solution designed to detect fraudulent applications so that they can be stopped before a credit profile is affected.

[OVER]

We encourage you to enroll for this service today by following these instructions:

1) Go to <https://store.lifelock.com/enrollment?promocode=> [REDACTED]. Your Partner/Promo code is [REDACTED]. Your membership ID will be your first and last name plus your zip code (Example: JOHNDOE51301).

2) Continue entering your personal information.

You can also call LifeLock at (800) 899-0180 and speak with a live agent 24 hours a day, 7 days a week. Please note that you have until June 21, 2017 to enroll.

WHAT OTHER THINGS SHOULD YOU DO? In addition to subscribing to the LifeLock service, we recommend that you place a fraud alert on your credit files. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. **To place a fraud alert on your credit files:** Call any of the three major credit bureaus below. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts. The initial fraud alert stays on your credit report for 90 days. You can renew it after 90 days. The contact information of the three major credit bureaus are the following:

Equifax: equifax.com or 1-800-525-6285

Experian: experian.com or 1-888-397-3742

TransUnion: transunion.com or 1-800-680-7289

You may also request that all three credit-reporting agencies send you a copy of your creditor report for your review. Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit reports periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, file a police report, notify the Iowa Attorney General or report it to other law enforcement agencies. Get a copy of the police report or confirmation document; you may need it to clear up fraudulent debts.

If your personal information has been misused, visit the FTC's site at www.IdentityTheft.gov to get recovery steps and to file an identity theft complaint. Your complaint will be added to the FTC's Consumer Sentinel Network, where it will be accessible to law enforcers for their investigations.

You also may want to consider contacting the major credit bureaus at the telephone numbers above to place a credit freeze on your credit file. A credit freeze means potential creditors cannot get your credit report. That makes it less likely that an identity thief can open new accounts in your name.

You can also contact the IRS identity Protection Specialized Unit at 1-800-908-4490 for more information.

Contact For More Information: In case you need more information on this incident, what we are doing and what you can do to protect your personal information, please call us at 712-260-6204.

Kellie Beneke
President
Great Lakes Communication Corp.