

FRONTIER'S ZERO TOLERANCE PLEDGE – ACKNOWLEDGMENT OF COMPANY AND INDIVIDUAL REPRESENTATIVE PERSONNEL NOT TO ENGAGE IN UNETHICAL SALES PRACTICES. TO BE COMPLETED BY OWNERS, MANAGERS AND SALES REPS.

**ADVISORY TO ALL AGENTS SELLING FRONTIER SERVICES:**

Unethical sales practices are a serious problem facing the telecommunication industry today. Engaging in this behavior is illegal, harmful to customers, and will not be tolerated by Frontier. Frontier offers customers the highest quality, reliability, and value in the industry. These attributes are more than enough to attract customers, and a sales agent should never resort to fraud, deceit or trickery to generate sales.

The following document is designed to educate every person involved in the Promotion of Services about the effects of such unethical behavior, Frontier's zero tolerance towards such behavior and what can be done to prevent these intolerable sales practices.

Frontier's Zero Tolerance Pledge must be acknowledged before any company or individual begins Promoting Services on behalf of Frontier and must be reaffirmed as required by Frontier thereafter.

EXAMPLES OF UNETHICAL SALES PRACTICES. The following are examples of, and situations related to, unethical practices: (initial by each statement to signify your compliance)

- \_\_\_\_\_ Deliberately providing inaccurate information to the customer in order to secure the Order.
- \_\_\_\_\_ Unknowingly providing inaccurate information to the customer. It is the responsibility of the rep to understand all Frontier pricing, promotions and policies, and to remain current in this knowledge, in order to sell Frontier.
- \_\_\_\_\_ Misleading customers into believing that they must purchase multiple Services when Services can be purchased separately.
- \_\_\_\_\_ Persuading a Frontier existing customer to cancel their service and rebook a new Order.
- \_\_\_\_\_ Creating an order under another person's name and credentials.
- \_\_\_\_\_ The person who gave authorization really didn't have the authority to make the decision. Sometimes children, roommates, receptionists, secretaries, or assistants authorize a Service to qualify for some sort of premium or other inducement even though they lack the authority to make decisions on behalf of the customer.
- \_\_\_\_\_ Placing Orders for customers just to "get the sale" or reach a qualification or commission level. Laziness and "cutting corners" leads to mistakes, misunderstandings and fraudulent behavior.
- \_\_\_\_\_ Placing Orders for a customer without the customer's knowledge, as a result of spending a lot of time with a decision-maker of that customers and assuming that the person would be satisfied with Services.
- \_\_\_\_\_ Any rude, aggressive behavior displayed at any time while selling Frontier services or representing Frontier in any manner.
- \_\_\_\_\_ Slamming – the illegal practice of changing a customer's telephone service - local or long distance service - without the customer's permission.
- \_\_\_\_\_ Cramming – the practice of placing unauthorized, misleading, or deceptive charges on a customer's telephone bill. Entities that fraudulently cram people may rely on confusing telephone bills in order to mislead customers into paying for services that they did not authorize or receive.
- \_\_\_\_\_ Using Frontier's name and/or logo in any advertising without prior authorization is strictly prohibited. This includes, but is not limited to, social media, flyers, business cards, websites, signage, newspaper ads and radio/TV.
- \_\_\_\_\_ The use of overseas call centers is strictly prohibited.

EFFECTS OF UNETHICAL SALES PRACTICES. The following are examples of and situations related to the effects of unethical practices:

- illegal actions that are not be tolerated by Frontier;

- subjects Frontier to potential legal liability and regulatory action;
- creates a bad image and adversely affects Frontier and Representative's reputation;
- frustrating experience for customers who experience agent's poor behavior;
- takes time to investigate and correct;
- triggers Frontier's rejection of Orders;
- assessment of substantial monetary penalties and costs against Frontier;
- forfeiture of Commissions earned on account; and
- termination of Agreement and Representative's relationship with Frontier.

**FRONTIER AND FEDERAL, STATE, AND LOCAL REGULATORY AGENCIES TREAT UNETHICAL SALES PRACTICES IN THE TELECOMMUNICATIONS COMMUNITY AS A VERY SERIOUS PROBLEM.** The Federal Communications Commission, Federal Trade Commission, and state agencies routinely impose significant fines for such behavior on a per violation basis.

**HOW TO ENSURE QUALITY SALES PRACTICES:** (initial by each statement to signify your compliance)

\_\_\_\_\_ Be absolutely sure that each customer is indeed requesting Services. If a prospective customer is requesting information only, do not assume that they want to sign up for Services at that time.

\_\_\_\_\_ You must make sure that the person with whom you are speaking is a person with the authority to make decisions regarding Services purchases. It is essential that the person giving permission has the authority to make the decision. Children, roommates, receptionists, secretaries, and assistants typically do not have the authority to place Orders for Services for the residential customer or business customer, as applicable. If the person giving permission is different from the person with the actual authority to do so, you should attempt to contact the other person and do not place any Orders if you were unable to confirm intent to purchase from an authorized party. While this policy might jeopardize placing some Orders, it should give you a chance to retain sales by demonstrating your concern and professionalism.

\_\_\_\_\_ Make sure you understand Frontier's current pricing, promotions and policies before offering a sale.

\_\_\_\_\_ Review your Order with the customer before concluding the sales interaction.

\_\_\_\_\_ Take your time. Review the customer's information for accuracy and legibility.

\_\_\_\_\_ Don't force a sale that is not there.

\_\_\_\_\_ Complete a Frontier Customer Service Agreement (CSA) for every sale.

- NEVER write the customer's person information on the CSA (Social Security Number, Driver's License, Date of Birth, and Credit Card Information). This information must be entered directly into the ordering system, or the customer must provide it directly to the order input representative.
- All products, prices, promotions and fees MUST be marked clearly on the CSA.
- Every face to face interaction must have a **signed** Agreement from the customer.
- For phone orders, a CSA must be filled out and "phone order" written on the customer signature line.
- CSAs must be electronically transmitted to your office immediately after a sale is made.
- One copy of the CSA goes to the customer and keep the other for you or your office.

\_\_\_\_\_  
**Company Name**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Name**

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Email Address**

\_\_\_\_\_  
**Cell Number**