



IDENTITY THEFT PREVENTION EXECUTIVE SUMMARY

The City of Fountain Utilities created the Identity Theft Prevention Program pursuant to the Federal Trade Commission's Red Flags Rule and the Fair and Accurate Credit Transactions Act of 2003. This program has undergone extensive review by our Legal Counsel and was adopted by our City Council on October 28, 2008 with updates being reviewed and approved on October 7, 2011.

The purpose of this program is to detect, prevent and mitigate identity theft in connection with the opening of new residential or commercial utility accounts and monitoring existing accounts. Our program contains policies and procedures to handle red flags, which are patterns, practices, or specific activities that indicate the possible existence of identity theft. The program outlines these specific areas:

- Identify relevant Red Flags for new and existing accounts and incorporate those into the program.
- Respond appropriately to Red Flags that are detected to prevent and mitigate identity theft.
- Ensure the program is updated periodically by assessing risks to customers or to the safety and soundness of the utility from identity theft.

The City of Fountain is committed to non-disclosure of specific individual customer utility information to third parties that include, but is not limited to, federal, state and local agencies with the exception made for criminal investigative activities, at which time, before the release of individual customer specific information may be made, our legal counsel will be consulted.

The Identity Theft Prevention Program ensures the evaluation and assessment of risks, development and enforcement of policies and procedures specific to identity theft, training related to this program, and any other measures to provide assurances that methods established maintain a constant detection and prevention posture.