



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

RECEIVED  
APR 24 2020  
CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
Wayne, PA 19087

April 19, 2020

**INTENDED FOR ADDRESSEE(S) ONLY**

**VIA U.S. MAIL**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Communications & Power Industries LLC ("CPI") located at 811 Hansen Way, Palo Alto, CA 94304, and write, on behalf of CPI, to notify your Office of an incident that may affect the security of certain personal information of approximately one (1) New Hampshire resident. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CPI does not waive any rights or defenses regarding the applicability of New Hampshire law, the New Hampshire data breach notification statute, or personal jurisdiction.

**Nature of the Data Event**

On or around January 18, 2020, CPI noticed suspicious activity impacting the operability of certain CPI servers. CPI immediately launched an investigation to determine the nature and scope of this activity. Working with third-party forensic investigators, CPI determined that an unknown actor encrypted certain systems using malware, and also used malware to acquire a small number of files from two CPI locations. The investigation was unable to determine which specific information on the affected servers was actually acquired. Therefore, out of an abundance of caution, CPI undertook a comprehensive review of all files that could have been impacted. Through this review, which was completed on April 9, 2020, it was confirmed that personal information was present in files that may have been acquired by the malware. The investigation determined that the following types of information related to a New Hampshire resident may have been accessible: name and Social Security number.

### **Notice to New Hampshire Resident**

On or around April 20, 2020, CPI began providing written notice of this incident to potentially affected individuals, including approximately one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**


Upon learning of this incident, CPI moved quickly to investigate and respond, assess the security of relevant CPI systems, and identify potentially affected individuals. As part of CPI's ongoing commitment to the security of information, CPI is also reviewing existing policies, procedures, and existing security measures. Among other things, CPI has enhanced its security monitoring and anti-malware tools. CPI notified law enforcement and is also notifying relevant regulatory authorities of this event, as required by applicable law.

Additionally, CPI is providing potentially impacted individuals with complimentary access to 12 months of identity monitoring, fraud consultation, and identity theft restoration services through Kroll. CPI is providing potentially affected individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free 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, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4776.

Very truly yours,



Edward J. Finn of  
MULLEN COUGHLIN LLC

EJF/EW  
Enclosure

# **EXHIBIT A**



Communications &  
Power Industries LLC

811 Hansen Way  
Palo Alto, CA 94304 USA  
t +1 650 846 2900  
f +1 650 846 3276

<<Date>> (Format: Month Day, Year)

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>

## Re: Notice of Data Breach

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

Communications & Power Industries LLC ("CPI") is writing to inform you of an incident that may affect the security of some of your personal information. CPI is the current owner of ASC Signal Corporation, which was previously owned by Andrew Satellite Communications Group. This notice provides information about the incident, CPI's response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

**What Happened?** On or around January 18, 2020, CPI noticed suspicious activity impacting the operability of certain CPI servers. CPI immediately launched an investigation to determine the nature and scope of this activity. Working with third-party forensic investigators, CPI determined that an unknown actor encrypted certain systems using malware, and also used malware to acquire a small number of files from two CPI locations. The investigation was unable to determine which specific information on the affected servers was actually acquired. Therefore, out of an abundance of caution, CPI undertook a comprehensive review of all files that could have been impacted. Through this review, which was completed on April 9, 2020, it was confirmed that some of your personal information was present in files that may have been acquired by the malware.

**What Information Was Involved?** The information potentially acquired included your <<ClientDef1(ImpactedData)>>. To date, CPI is unaware of any actual or attempted misuse of your personal information as a result of this incident.

**What We Are Doing.** CPI takes this incident and the security of personal information in its care seriously. Upon learning of this incident, CPI moved quickly to investigate and respond, assess the security of relevant CPI systems, and identify potentially affected individuals. As part of CPI's ongoing commitment to the security of information, CPI is also reviewing existing policies, procedures, and existing security measures. Among other things, CPI has enhanced its security monitoring and anti-malware tools. CPI also notified law enforcement and other governmental bodies.

CPI is offering you access to complimentary identity monitoring, fraud consultation, and identity theft restoration services for 12 months through Kroll. If you wish to activate the identity monitoring services, you may follow the instructions included in the *Steps You Can Take to Help Protect Personal Information*.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud, and to review your account statements and credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Help Protect Personal Information*. There you will also find more information on the identity monitoring, fraud consultation, and identity theft restoration services CPI is making available to you. While CPI will cover the cost of these services, you will need to complete the activation process.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our call center at [1-800-833-3333](tel:1-800-833-3333), Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, (excluding U.S. holidays.) You may also write to CPI at: 811 Hansen Way, Palo Alto, CA 94304.

We sincerely regret any inconvenience or concern this incident may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Mogin". The signature is fluid and cursive, with a large loop at the end of the last name.

Amanda Mogin  
Senior Director, Corporate Communications and Administration  
Communications & Power Industries LLC



## Steps You Can Take to Help Protect Personal Information

### **Activate Identity Monitoring**

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [https://\[IDMonitoringURL\]](https://[IDMonitoringURL]) to activate and take advantage of your identity monitoring services.

You have until **[Date]** to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

### **Monitor Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

#### **Experian**

PO Box 9554

Allen, TX 75013

1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 160

Woodlyn, PA 19094

1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

#### **Equifax**

PO Box 105788

Atlanta, GA 30348-5788

1-800-685-1111

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

#### **Experian**

P.O. Box 9554

Allen, TX 75013

1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

#### **TransUnion**

P.O. Box 2000

Chester, PA 19016

1-800-680-7289

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

#### **Equifax**

P.O. Box 105069

Atlanta, GA 30348

1-888-766-0008

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

## **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

*For Maryland residents*, the Attorney General can be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662; and [www.oag.state.md.us](http://www.oag.state.md.us).

*For North Carolina residents*, the Attorney General can be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226; or 1-919-716-6000; and [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

*For New York residents*, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; and <https://ag.ny.gov/>.



## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You've been provided with access to the following services<sup>1</sup> from Kroll:

### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.