

**STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD**

IN RE: PRODIGY SOLUTIONS, INC.	DOCKET NO. TF-2019-0032
IN RE: SECURUS TECHNOLOGIES, INC.	DOCKET NO. TF-2019-0033
IN RE: LEGACY LONG DISTANCE INTERNATIONAL, INC.	DOCKET NO. TF-2019-0035
IN RE: GLOBAL TEL*LINK	DOCKET NO. TF-2019-0039
IN RE: PUBLIC COMMUNICATIONS SERVICES, INC.	DOCKET NO. TF-2019-0040

**THE PRISON POLICY INITIATIVE’S MOTION FOR
AMENDED ORDER GRANTING INTERVENTION**

1. On April 17, 2019, Prison Policy Initiative, Inc. (“PPI”) filed an Objection to Proposed Tariff, Request for Docketing, and Petition for Intervention in *In re Reliance Telephone of Grand Forks, Inc.*, Docket No. TF-2019-0026.

2. On April 22, 2019, PPI filed objections and intervention motions in the five above-captioned proceedings, all of which were substantively similar to PPI’s objection filed in the *Reliance* proceeding. All five of PPI’s April 22 filings appear on the Iowa Utilities Board’s public docket available through the Board’s Electronic Filing System.

3. On May 1, 2019, the Board issued an Order Docketing Tariffs for Further Review, Cancelling Certain Registration and Tariffs, and Granting Intervention (the “Order”). The Order docketed eleven tariffs for further review, including the *Reliance* tariff and the five

above-captioned tariffs. The Order also granted PPI's motion to intervene in the *Reliance* proceeding, but was silent as to PPI's motions to intervene in the five above-captioned proceedings.

4. In the Order, the Board granted PPI's motion to intervene in the *Reliance* proceeding upon a finding that PPI "meets the requirements for intervention since it has stated an interest in the subject matter of the rates charged for inmate calling services, no other party has intervened to represent the interest of those affected by the revised tariff, and the participation of PPI as a party may reasonably be expected to assist in the development of the record in Docket No. TF-2019.0026." Order at 5.

5. For the reasons set forth in our April 22 filings, PPI asserts that it has identical interests in and expertise regarding the five above-captioned tariffs as it does with respect to the *Reliance* tariff. For this reason, PPI respectfully moves the Board for entry of an amended order granting PPI's motions to intervene in Docket Numbers TF-2019-0032, TF-2019-0033, TF-2019-0035, TF-2019-0039, and TF-2019-0040.

Dated: May 7th, 2019

Respectfully submitted,

PRISON POLICY INITIATIVE, INC.

/s/ Peter Wagner

By Peter Wagner, Executive Director
69 Garfield Ave., 1st Floor
Easthampton, MA 01027
(413) 527-0845
pwagner@prisonpolicy.org