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September 23, 2019
Via Web Filing

Executive Secretary
Iowa Utilities Board
1375 E. Court Avenue
Room 69
Des Moines, IA 50319-0069

RE: Pay Tel Communications, Inc.
Response to Order Initiating Inquiry
Docket No. NOI-2019-0001

Dear Executive Secretary:

Enclosed for filing please find the responses to the Order Initiating Inquiry into Regulatory Requirements for Alternative Operator Services Companies submitted on behalf of Pay Tel Communications, Inc. in the above referenced docket number.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren
Consultant

cc: J. Vincent Townsend - Pay Tel Communications, Inc.
Office of Consumer Advocate
tms: IAx1903

Enclosures
SW/mp

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE:	DOCKET NO. NOI-2019-0001
INQUIRY INTO REGULATORY	
REQUIREMENTS FOR ALTERNATIVE	
OPERATOR SERVICES COMPANIES	

RESPONSE TO ORDER INITIATING INQUIRY

Pay Tel Communications, Inc. 's Response to Iowa Utilities Board Questions - September 19, 2019

1. Should all AOS companies' tariffs have consistent definitions for the services provided, identify the types of facilities where the service is offered, offer the same types of service, offer the same calling options, and contain the same requirements for billing and cancellation of service?

Response: *Pay Tel does not presently have any client facilities in Iowa, and would therefore not be significantly impacted by the decision to standardize tariffs and terminology. While consistent definitions and a clear indication of the types of facilities where service is offered may provide improved consumer benefit; each vendor has distinct calling options, terms and billing requirements. Standardization of billing requirements may have a substantial financial impact on vendors.*

2. What criteria or considerations should the Board use to determine whether rates charged by an AOS company are just and reasonable? This includes the basic rates and any ancillary rates.

Response: *The standard set by the FCC for just and reasonable interstate inmate calling service rates provides an appropriate benchmark by which the state can establish rate caps. The FCC also prohibited per call charges and established a cap for a specific list of permitted fees; prohibiting all other fees. Given the exhaustive evaluation made by the FCC to reach these conclusions, it makes sense to mirror those regulations for these services within the state of Iowa.*

3. Should an AOS company be allowed to offer rates and service for non-correctional facilities that are different from rates and services provided to correctional facilities?

Response: *Yes. AOS companies offering rates and service for non-correctional facilities have different costs and market considerations from AOS companies that serve only the corrections market. Recommended rate and fee caps established by the FCC for corrections are specific to that segment of the operator services market.*

4. Should agreements between facilities, including state or local correctional facilities, and an AOS company also be filed with the Board, similar to the AOS tariff?

Response: *No. These agreements are generally the result of a public request for proposals and are public information. The requirement to file agreements with the Board would not improve visibility of these agreements and would add administrative burden on both the Board and the vendors.*

5. Companies that are providing AOS service are requested to provide a description of that company's current corporate structure and affiliations and whether that company is a successor to a company that previously provided AOS service in Iowa.

Response: *Pay Tel Communications, Inc. is a North Carolina corporation. The company has been under the same name and ownership for 33 years. Pay Tel is not a successor to any other AOS company and does not have any affiliations with other AOS vendors.*

6. What information regarding AOS service should be considered confidential and not available for public inspection?

Response: *Financial statements of privately held companies and related cost information should be considered confidential and withheld from public inspection.*

7. Are the Board's current registration and billing procedures understandable and are there any issues or questions about those procedures?

Response: *199 Iowa Admin. Code 22.19(3) which addresses blocking creates a security issue in service provided to correctional facilities. The provision of calling services to correctional facilities is unique due to the inherent security issues. Facilities contract with a single vendor to carry all calls in order to strictly control calling and to specifically prevent prohibited calling, i.e. calls to witnesses, victims, jurists, etc. If calls were allowed to be passed to another carrier, these controls would not be in place, creating a significant public safety issue.*

8. When would an AOS company select only one of the options on the current telecommunications registration form (Local Exchange Service; Interexchange Service; Data Transmission; Alternative Operator Services Only; Other) or a combination of options?

Response: *Pay Tel's direct experience is as an Inmate Communications Service (ICS) provider which currently falls under the AOS only category. Due to the unique requirements of providing service to the correctional facilities, it makes sense to have a specific registration option for ICS only.*