



September 18, 2019

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

**RE: Reply Comments to Iowa Utilities Board's Inquiry into Regulatory Requirements for Alternative Operator Services Companies
Docket No. NOI-2019-0001**

Dear Executive Secretary:

In response to the Iowa Utilities Board's (IUB) order on August 20, 2019, Legacy Long Distance International, Inc. ("Legacy") submits the following comments.

Legacy is motivated by a desire to maximize communication for incarcerated people in a secure manner. Based on our experiences as an inmate calling services (ICS) provider, we believe it is essential that the IUB ensures that jail phone calls are affordable for all Iowa families and that there is a level playing field for all competitors in the ICS industry.

In 2017, Legacy was purchased by Edovo. Edovo's mission is to help everyone affected by incarceration build better lives and we understand that low phone rates are crucial to this mission. Promoting communication between incarcerated people and their families is a well-documented way to reduce recidivism, and we have seen how low inmate phone rates ensure that all families can afford to communicate with each other.

Unfortunately, the market for inmate calling services in Iowa and in most states is inefficient, often dysfunctional, and regulation could be a critical solution. The industry is dominated by a few large players who offer unnecessarily complicated pricing schemes and hidden fees as well as broad bundles of services that hide these costs and all too often meet the needs of neither the facilities nor of the families who are paying for the calls.

For that reason, we urge the IUB to ensure reasonable rates and to level the playing field. You can do this by establishing a cap on the cost of calls and/or commissions. You can also make strides toward transparency and accountability by requiring the pricing breakout of the cost of minutes from any additional commission that is passed on to the consumer just as you would a government imposed fee or tax.

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We also wanted to share our observation with the IUB that the majority of contracts (and RFPs) for telephone service are now bundled with other, unregulated products. While some bundling makes logical sense and can improve the communication options for those who are incarcerated, we are concerned that this trend, if not constrained, will restrict competition, lessen facility choice, and undermine existing and future price controls. We therefore also urge you to limit the ability of companies to bundle unaffiliated, non-communication products into the same contract.

Any questions you may have regarding this filing should be directed to my attention at (602) 403-9905 or via email to brian@edovo.com. Thank you for your assistance in this matter.

Respectfully,

/s/Brian Hill

Brian Hill
CEO