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September 16, 2019
Via Web Filing

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

RE: Network Communications International Corp d/b/a NCIC Inmate Communications
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 Network Communications International Corp. d/b/a NCIC Inmate Communications 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: Stephanie Jackson - NCIC
Office of Consumer Advocate
tms: IAx1903

Enclosures
SW/mp

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

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

In response Network Communications International Corp d/b/a NCIC Inmate Communications provides the following information:

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: The Iowa Utilities Board should provide a sample tariff for inmate service providers that define the common language used within the industry. The Alabama PSC (APSC) provides a proposed document on their website that is comprehensive.

You may find this document at:

http://www.psc.alabama.gov/Telecom/Engineering/documents/Proposed_Inmate_Phone_Service_Tariff.pdf

For the most part, the FCC, Alabama PSC, Ohio PUC, Louisiana PSC and the Georgia PSC all offered similar definitions of services provided, types of services, same calling options, same requirements for billing and cancellation of services, including the fees that could be charged for those services.

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 FCC spent countless hours refining their criteria regarding all areas related to ITS rates and fees *based on actual cost data provided by all the AOS companies*. Alabama took into consideration the FCC Inmate Calling Rates and Fees and effectively implemented rules closely related to them. *The FCC Interim rate caps are as follows:*

Rates	
Collect Per-Min	Prepaid Per-Min
\$0.25	\$0.21

Payment Fees	Maximum Fee
Money order or check mailed to provider or payment via online banking transfer	\$0.00
Debit/credit card online or telephonically via interactive voice response (IVR); or by cash or debit/credit card at the ICS provider's kiosk	\$3.00
Debit/Credit card telephonically via a live agent	\$5.95
Bill processing fee for collect calls billed by the call recipient's carrier	\$3.00
Convenience Fee for transfers from the inmate's canteen/trust fund	5% of transfer amount
Fee for Optional Paper Billing Statement	\$2.00

NCIC is very supportive of the efforts by the FCC to streamline reasonable rates and fees. NCIC chose to implement the same or less expensive rate guideline across the U.S.

- 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, rates specific to institutional facilities should only be specific to institutional service. Equipment, programming and service needs will vary widely between non-correctional and correctional facilities/contracts. Most residents at non-correctional facilities have other options of communications, such as mobile phones, using phones at work or using coin phones provided at the facility.

- 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. Most agreements are attainable through a Public Records Request. Agreements are amended and extended often. This would be a record-keeping nightmare to maintain, for both IOWA and the service provider.

- 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 If there is a new registration or a name change to a current provider, then that would be fine to request a current corporate structure. Other than that, there should be no annual filing requirements as it is too time consuming for both IOWA and the service provider.

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

Response: Financial related items such as interim financial statements, agreements with facilities (obtained outside of a Public Records Request - FOIA), annual audits, etc... should be considered confidential. Data requests should also be considered confidential.

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

Response: In regards to registration, it would be beneficial to have an Inmate Provider option so it is clear what type of services a carrier would be providing. Also, be specific in which AOS rules the ISPs are specifically exempt from, so that there's no ambiguity and the providers wouldn't have to ask for waivers from these rules.

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: An AOS company would choose AOS if they are only providing those services. However, if they provide other options (local service, regular IXC (LD) services, Data Transmission) then they would choose more than one option.