

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

IN RE:	
RELIANCE TELEPHONE OF GRAND FORKS, INC.	DOCKET NO. TF-2019-0026
INMATE CALLING SOLUTIONS, LLC	DOCKET NO. TF-2019-0030
COMBINED PUBLIC COMMUNICATIONS, LLC	DOCKET NO. TF-2019-0031
PRODIGY SOLUTIONS, INC.	DOCKET NO. TF-2019-0032
SECURUS TECHNOLOGIES, INC.	DOCKET NO. TF-2019-0033
PAY-TEL COMMUNICATIONS, INC.	DOCKET NO. TF-2019-0036
NETWORK COMMUNICATIONS INTERNATIONAL CORP d/b/a NCIC INMATE COMMUNICATIONS	DOCKET NO. TF-2019-0037
GLOBAL TEL*LINK CORPORATION	DOCKET NO. TF-2019-0039
PUBLIC COMMUNICATIONS SERVICES, INC.	DOCKET NO. TF-2019-0040
CONSOLIDATED TELECOM, INC.	DOCKET NO. TF-2019-0261
ENCARTELE, INC.	DOCKET NO. TF-2019-0270
INQUIRY INTO REGULATORY REQUIREMENTS FOR ALTERNATIVE OPERATOR SERVICES COMPANIES	DOCKET NO. NOI-2019-0001

REQUEST FOR PERMISSION TO APPEAR PRO HAC VICE

COMES NOW, Chérie R. Kiser, and respectfully requests that I be permitted to appear *pro hac vice* as counsel on behalf of Global Tel*Link Corporation and Public Communications Services, Inc. (collectively, “GTL”) before the Iowa Utilities Board (“Board”) in the above-

captioned matters.¹ Consistent with Iowa Court Rule 31.14(5), I state as follows:

1. My full name is Chérie R. Kiser, and my residence and business address are as follows:

<u>Residence:</u>		<u>Business:</u>
1603 Walden Drive McLean, Virginia 22101		1990 K Street, N.W., Suite 950 Washington, D.C. 20006

2. I seek to represent GTL. GTL's address is 3120 Fairview Park Drive, Suite 300, Falls Church, Virginia 22042. GTL's phone number is 813-380-1513.

3. I am a Partner at law firm Cahill Gordon & Reindel LLP. I am licensed to practice law and an active member of the District of Columbia bar (1988) and I am an inactive member of the Pennsylvania Bar (1987).

4. I have not been denied admission *pro hac vice* in the State of Iowa.

5. I have not had admission of *pro hac vice* revoked in the State of Iowa.

6. I have not been denied admission in any jurisdiction to which I have applied.

7. I have not been formally disciplined or sanctioned by any court in the State of Iowa.

8. I have not been the subject of any injunction, cease-and-desist letter, or other action arising from a finding that the out-of-state lawyer engaged in the unauthorized practice of law in this state or elsewhere.

9. No formal, written disciplinary proceeding has been brought against me by a disciplinary authority or unauthorized practice of law commission in any jurisdiction with the

¹ GTL intends and expects to file a Petition for Intervention in Docket Nos. TF-2019-0026, TF-2019-0030, TF-2019-0031, TF-2019-0032, TF-2019-0033, TF-2019-0036, TF-2019-0037, TF-2019-0261, and TF-2019-0270.

last five years.

10. I have not been placed on probation by a disciplinary authority in any other jurisdiction.

11. I have not been held formally in contempt or otherwise sanctioned by any court in a written order in the last five years.

12. I have not filed an application to appear *pro hac vice* in this state within the preceding two years. I do, however, seek permission to appear in 12 individually docketed matters on behalf of my client, GTL. Good cause exists for the Board to grant this request and treat it as a single matter for purposes of Iowa Court Rule 31.14.,² as all 12 matters arise out of a single rule making docket, RMU-2017-0004. In the Board's January 2, 2019 Order Terminating Rule Making in RMU-2017-0004, it instructed all AOS companies, including GTL, "to file current tariffs with the Board for review."³ On May 1, 2019, the Board individually docketed each such tariff submission for further review.⁴ On August 20, 2019, the Board opened docket NOI-2019-0001, as a means of "conducting a broader review that includes all interested AOS stakeholders" pursuant to its review of "the proposed new tariffs and the responses to the Board's questions" posed in RMU-2017-0004.⁵ Good cause for my request also exists due to the congruity of GTL's interests in each of these 12 matters. GTL has actively commented on the

² See Docket Nos. TF-2019-0026, *Reliance Telephone of Grand Forks, Inc.*; TF-2019-0032, *Prodigy Solutions*; TF-2019-0033, *Securus Technologies, Inc.*; TF-2019-0035, *Legacy Long Distance International, Inc.*; TF-2019-0039, *Global Tel*Link Corporation*; TF-2019-0040, *Public Communications Services, Inc.*, Order Granting Admission Pro Hac Vice, 2-3 (June 11, 2019).

³ Docket No. RMU-2017-0004, *Rule Making Regarding Inmate Calling Rate Caps [199 IAC Chapter 22]*, Order Terminating Rule Making, 6 (Jan. 2, 2019) ("January 2019 Order").

⁴ Docket Nos. TF-2019-0026 et al., Order Docketing Tariffs for Further Review, Cancelling Registration and Tariffs, and Granting Intervention (May 1, 2019).

⁵ Docket No. NOI-2019-0001, *Inquiry into Regulatory Requirements for Alternative Operator Service Companies*, Order Initiating Inquiry, 1-2 (Aug. 20, 2019).

evolving AOS regulatory framework through participation in Iowa NOI-2019-0001,⁶ and seeks – via the singular Petition for Intervention filed in each of the individually docketed, non-GTL tariff proceedings – to participate in the remaining matters on the basis of identical interests and expertise. Good cause therefore exists for the Board to exercise the discretion provided in Iowa Court Rule 31.14(7) and grant my request, deeming this a single matter for purposes of Iowa Court Rule 31.14.⁷

13. I acknowledge that I am familiar with the rules of professional conduct, the disciplinary procedures of this state, the standards for professional conduct, the applicable local rules, and the procedures of the court or agency before which the out-of-state lawyer seeks to practice. Pursuant to Board Rule 199 IAC § 7.4(8), I agree to submit to and comply with the Iowa Code of Professional Responsibility for Lawyers.

14. I have registered with the Office of Professional Regulation and paid the fee as required by Iowa Court Rule 31.14(11).

15. The following in-state lawyer is in good standing of the bar of the State of Iowa and is sponsoring my *pro hac vice* request:

John C. Pietila (AT 0006221)
Davis, Brown, Koehn, Shors & Roberts, P.C.
4201 Westown Pkwy, Ste. 300
West Des Moines, Iowa 50266
515-246-7871

16. I acknowledge that service upon Mr. Pietila in all matters connected with this

⁶ See Docket No. NOI-2019-0001, *Inquiry into Regulatory Requirements for Alternative Operator Service Companies*, Response to Board Order (Sept. 19, 2019); Reply to Responses to Order Initiating Inquiry (Oct. 4, 2019); Request for Leave to File Sur-Reply (Oct. 14, 2019).

⁷ See Docket Nos. TF-2019-0026, *Reliance Telephone of Grand Forks, Inc.*; TF-2019-0032, *Prodigy Solutions*; TF-2019-0033, *Securus Technologies, Inc.*; TF-2019-0035, *Legacy Long Distance International, Inc.*; TF-2019-0039, *Global Tel*Link Corporation*; TF-2019-0040, *Public Communications Services, Inc.*, Order Granting Admission Pro Hac Vice, 2-3 (June 11, 2019).

proceeding has the same effect as if personally made on me.

17. I am not aware of any additional information necessary to support this request for admission *pro hac vice*.

I hereby verify that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Dated this 26th day of June, 2020.

Respectfully submitted,

/s/ Chérie R. Kiser

Chérie R. Kiser
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202-862-8950
ckiser@cahill.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 26th day of June 2020, she had the foregoing document electronically filed with the Iowa Utilities Board using the Electronic Filing System, which will send notification of such filing (electronically) to the appropriate persons.

/s/John Pietila