

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA 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
NETWORK COMMUNICATIONS INTERNATIONAL CORP d/b/a NCIC INMATE COMMUNICATIONS	DOCKET NO. TF-2019-0037
CONSOLIDATED TELECOM, INC.	DOCKET NO. TF-2019-0261
ENCARTELE, INC.	DOCKET NO. TF-2019-0270

RESPONSE TO PETITION FOR INTERVENTION

The Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, files its response to the petition for intervention filed June 29, 2020, in each of these dockets, by Global Tel*Link Corporation and Public Communications Services, Inc. (collectively, GTL).

1. The petition for intervention is of questionable merit. GTL has its own tariff docket, No. TF-2019-0039. It is unclear what benefit GTL would gain from intervention in the tariff dockets of the other inmate calling service providers. Nothing prevents GTL from monitoring the progress of the other dockets. Any concerns it may have can be voiced in its own docket.

2. While consistent, comprehensive, and industry-wide regulations of the sort referenced by GTL might be beneficial, achievement of that goal is better suited to a rule-making docket, and the Board has chosen at this time to proceed with the tariff dockets rather than a rule-making docket. It is not reasonable to expect that the several tariffs will be precisely the same.

3. The petition for intervention is untimely. These proceedings have been pending for some time. The time for objection to proposed tariffs has in some cases passed. Two of the dockets have proceeded to a technical conference.

4. Inmates and their families have been subjected to high and at times exorbitant calling rates for many years. There should be no delay in the progress and conclusion of these dockets and the implementation of the tariffs.

5. Any intervention rights granted to GTL should be strictly limited to ensure that the proceedings progress and are concluded without delay.

WHEREFORE, OCA urges that any intervention rights granted to GTL be strictly limited to ensure that the proceedings progress and are concluded without delay.

Respectfully submitted,

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OFFICE OF CONSUMER ADVOCATE