

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
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
NETWORK COMMUNICATIONS INTERNATIONAL CORP d/b/a NCIC INMATE COMMUNICATIONS	DOCKET NO. TF-2019-0037
GLOBAL TEL*LINK CORPORATION	DOCKET NO. TF-2019-0039
ENCARTELE, INC.	DOCKET NO. TF-2019-0270

**MOTION FOR INTERVENTION OF SECURUS TECHNOLOGIES, LLC**

Pursuant to 199 Iowa Administrative Rule 7.13, Securus Technologies, LLC (“Securus”) respectfully petitions the Iowa Utilities Board (“Board”) for intervention in each of the above-captioned dockets. Each of these dockets pertains to an investigation of rates, terms and conditions in updated tariffs filed by inmate calling services (“ICS”) providers. One of those providers, Global Tel\*Link (“GTL”), a competitor of Securus, was provided a similar right of intervention on July 23, 2020.

As further described below, Securus meets the criteria for intervention under Board Rule 7.13(3) and seeks intervention to participate in the dockets to ensure that the issues raised and

decisions reached in the various dockets are equitable among competitors, and to be aware and potentially respond should Securus' services be brought up in other proceedings.

**7.13(3)(a),(b)** – Securus has a significant interest in the outcome of each proceeding.

Each of the above-listed proceedings involves a competitor of Securus in the ICS space.

Moreover, as GTL's reply in support of its motion described, there appears to be inconsistency in how providers are treated and in the questions and issues raised between and across the dockets.

To the extent that regulatory decisions in any one docket may in the future be expected of other ICS providers, Securus has a clear, strong interest in those discussions, and intervention is the appropriate method to protect that interest.

**7.13(3)(c),(d)** – Securus' interests will not be represented by any of the current parties to the proceedings. GTL and the filer of each tariff are the only ICS providers in each proceeding, and the interests of ICS providers are in conflict because they directly compete. Moreover, each ICS provider has unique aspects to its business model, and a unique set of customers such that there is no assurance their interests will always align. GTL's presence in all dockets does not diminish this need; it increases it as GTL would have unique information that may provide it with a discriminatory advantage over other competitors if only GTL is permitted to intervene. There is no substitute for Securus' participation by which Securus could similarly protect its interests.

**7.13(3)(e)** – Securus' involvement in these dockets as a party will assist in the development of the record by providing additional expertise regarding the provision of ICS. As a leading ICS provider in Iowa, Securus is uniquely situated to provide this information should issues involving Securus arise that would benefit the Board in reaching an informed decision.

Securus meets all requirements to intervene. Moreover, there is no basis for denying Securus the right of intervention already granted to its competitor, GTL. Accordingly, the Board should grant Securus' Petition, making Securus a full party and entering the undersigned on the service list in each above-captioned docket.

Respectfully submitted this 14th day of August, 2020.

By: /s/ Bret A. Dublinske

Bret A. Dublinske (#0002232)

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ATTORNEYS FOR SECURUS  
TECHNOLOGIES, LLC

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 14<sup>th</sup> day of August 2020, he had the foregoing document electronically filed with the Iowa Utilities Board using the EFS system which will send notification of such filing (electronically) to the appropriate persons.

/s/ Bret A. Dublinske

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