

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

IN RE:	
GLOBAL TEL*LINK CORPORATION	DOCKET NO. TF-2019-0039

COMMENTS IN SUPPORT OF REVISED TARIFF

Global Tel*Link Corporation (“GTL”) respectfully submits these Comments in response to the Order Requiring Filing of Tariff Revisions and Annual Registration, issued by the Iowa Utilities (“Board”) on August 20, 2020, in the above-referenced matter (“Order”). GTL provides the following comments in support of the revised alternative operator service (“AOS”) tariff filed by GTL on September 21, 2020 (the “Tariff”) in compliance with the Board’s Order.

1. GTL has revised Section 2.10.4 of the Tariff to clarify that the “provision regarding blocking, payment, and a predetermined amount” applies to calls placed directly by inmates to bail bondsmen.¹ Pursuant to 199 IAC 22.6(7), GTL has also added a statement of noncompliance with respect to 199 IAC 22.6(2).²

2. GTL has revised Section 2.11 of the Tariff to delineate all applicable taxes, fees, and surcharges it intends to pass through to its customers as separate line items.³

3. GTL has revised Section 2.14 of the Tariff in conformity with the language suggested by the Board.⁴

¹ See Order at 7.

² *Id.*

³ See Order at 8.

⁴ See Order at 9.

4. GTL has revised existing language in Section 3.4 and Section 3.4(6) of the Tariff to reflect an explicit statement of noncompliance with 199 IAC 22.6(2) and 22.6(3), respectively.⁵

5. GTL has revised Section 3.5.2 of the Tariff to indicate that any discounts are required to be included in the tariff and approved by the Board.⁶

6. GTL has revised Section 3.6 of the Tariff to clarify the process by which a customer may seek a refund of unused funds in his or her AdvancePay Account, and, following closure of an AdvancePay Account for zero activity, the process by which a customer may seek a reactivation of his or her AdvancePay account or a refund of the unused funds therein.

7. GTL has revised Section 3.7.1 of the Tariff to incorporate the statement from Section 3.6 regarding account refunds – “Any remaining balance in the Account will be refunded to the Customer after deducting any call charges, applicable taxes and transaction fees incurred during the current billing cycle” – and clarify that, following closure of a Prepaid Debit Account for zero activity, any unused funds are refundable upon request.⁷

8. Finally, GTL turns to the issue of contractual arrangements with third-party financial institutions. In responding to the Board’s directive, GTL notes that such arrangements are permissible under both federal and Iowa law and do not constitute ancillary service charges according to FCC precedent. Without waiving its rights to challenge the propriety and/scope of future data requests on this matter,⁸ GTL confirms that it has no contracts or arrangements with

⁵ *Id.*

⁶ *See* Order at 10.

⁷ *See* Order at 11.

⁸ *See In Re: Securus Technologies, Inc.* Docket No.TF-2019-0033, Order Addressing Motion to Compel, September 16, 2020.

Western Union, MoneyGram, or similar companies that mark up the transaction fees to inmates or inmate families.

CONCLUSION

WHEREFORE, GTL respectfully requests that the Board approve the Tariff, pursuant to its revisions thereto and comments above.

Respectfully submitted,

**GLOBAL TEL*LINK CORPORATION
PUBLIC COMMUNICATIONS SERVICES, INC.**

/s/ John C. Pietila

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Dated: September 21, 2020

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 21st day of September 2020, he 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 C. Pietila _____