

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

IN RE GLOBAL TEL\*LINK  
CORPORATION

DOCKET NO. TF-2019-0039

**PRISON POLICY INITIATIVE'S COMMENTS REGARDING  
GLOBAL TEL\*LINK'S REVISED TARIFF**

Pursuant to the Board's order of August 20, 2020, Global Tel\*Link ("GTL") filed a revised tariff in the above-captioned proceeding on September 21, 2020 (the "Revised Tariff"). The Prison Policy Initiative ("PPI"), having previously been granted leave to intervene in this proceeding, submits the following comments for the Board's consideration.

Tax provision (§ 2.11). The Office of Consumer Advocate ("OCA") filed comments on September 30, 2020, regarding the ambiguous language in § 2.11 of the Revised Tariff. OCA Cmt. at 2. PPI joins with OCA's comments and notes that nothing in the Revised Tariff expressly prohibits GTL from marking up taxes and government fees. For the sake of clarity, PPI suggests that the Revised Tariff should be amended to specify that any taxes or government fees that GTL passes through to customers must be charged at face value, with no markup.

Account refund provisions (§§ 3.6 and 3.7.1). PPI also joins with OCA's comments regarding refunds of prepaid funds. In particular, PPI would support a requirement that all inmate calling service tariffs must specify that customer prepaid funds are "utility deposits" for purposes of Iowa Code § 556.4.

Deposit fees (§ 3.8.1). Section 3.8.1 of the Revised Tariff states that GTL levies a fee of not more than \$3 for "payments made by interactive voice response (IVR), web, or kiosk." PPI has discovered that GTL appears to be charging \$4.63 for a deposit of \$50 made via GTL's website. *See* Declaration of Alexi Jones (attached hereto). To the extent that GTL has been charging automated payment fees in excess of \$3, PPI suggests that the Board should enter an order requiring GTL to refund the improper charges.

PPI respectfully requests that the Board give consideration to the comments filed herein before approving the Revised Tariff.

Dated: October 5, 2020

Respectfully submitted,

**PRISON POLICY INITIATIVE, INC.**

/s/ Peter Wagner

By Peter Wagner, Executive Director  
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**DECLARATION OF ALEXI JONES**

I, Alexi Jones, declare as follows:

1. I am employed as a policy analyst at the Prison Policy Initiative. I am over the age of eighteen, and I make the following declaration based on my own personal knowledge. If called upon to testify concerning the matters expressed herein, I could and would competently do so under oath.

2. On October 1, 2020, I accessed the website web.connectnetwork.com, operated by Global Tel\*Link (“GTL”), and attempted to make a deposit to a GTL “Advance Pay” prepaid account for calling service to the Black Hawk County (Iowa) jail. The “applicable transaction and payment fee” for the transaction is displayed in the following screenshot:

The screenshot displays a 'Review' page for an 'AdvancePay Phone' transaction. The page is divided into sections by horizontal dashed lines. The first section shows 'Phone Number: (515) Redacted' and 'Facility: Black Hawk County IA'. The second section shows 'Card Number: Mastercard Ending in Redacted', 'Name on Card: Alexi Jones', 'Card Expiration Date: 07/2023', and 'Billing Address Zip Code: 01060'. The third section shows a summary of costs: 'Total: \$50.00', 'Applicable Transaction and Payment Fee: \$4.63', and 'Deposit Amount: \$45.37'. At the bottom center, there is a purple 'SUBMIT' button.

<b>AdvancePay Phone: Review</b>	
Phone Number:	(515) Redacted
Facility:	Black Hawk County IA
-----	
Card Number:	Mastercard Ending in Redacted
Name on Card:	Alexi Jones
Card Expiration Date:	07/2023
Billing Address Zip Code:	01060
-----	
Total:	\$50.00
Applicable Transaction and Payment Fee:	\$4.63
Deposit Amount:	\$45.37
-----	
<b>SUBMIT</b>	

I have redacted the phone number and payment-card digits associated with the transaction, but in all other respects the preceding screenshot is a true and accurate record of the information displayed by GTL's website

3. On October 1, 2020, I accessed the website web.connectnetwork.com and attempted to make a deposit to a GTL "Advance Pay" prepaid account for calling service to the Scott County (Iowa) jail. The "applicable transaction and payment fee" for the transaction is displayed in the following screenshot:

The screenshot displays a 'Review' page for an 'AdvancePay Phone' transaction. It lists the following information:

Phone Number:	(774) Redacted
Facility:	Scott County IA-Jail
Card Number:	Mastercard Ending in Redacted
Name on Card:	Alexi Jones
Card Expiration Date:	07/2023
Billing Address Zip Code:	01060
Total:	\$50.00
Applicable Transaction and Payment Fee:	\$4.63
Deposit Amount:	\$45.37

A purple 'SUBMIT' button is located at the bottom right of the form.

I have redacted the phone number and payment-card digits associated with the transaction, but in all other respects the preceding screenshot is a true and accurate record of the information displayed by GTL's website.

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I certify under penalty of perjury and pursuant to Iowa Code § 622.1 that the preceding is true and correct.

/s/ Alexi Jones  
Alexi Jones

10/5/2020  
Date