

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: PRODIGY SOLUTIONS, INC.	DOCKET NO. TF-2019-0032
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COMMENT

On further consideration, the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, suggests two changes to section 2.7 of the revised proposed tariff filed October 5, 2020, captioned “Mandatory Taxes, Mandatory Fees and Authorized Taxes.” First, it is OCA’s understanding that the federal Universal Service Fund charge has no application to intrastate calls. If so, because the Iowa tariff is limited to intrastate calls, the reference to this charge should be deleted or at least stated to be inapplicable to intrastate calls. Second, for greater clarity, for consistency with the tariffs of other inmate calling service providers, and to prevent other ICS providers from misreading the sentence as not applying to intrastate calls,¹ OCA suggests that the second sentence of proposed section 2.7 be revised to read: “The billing of taxes and fees on intrastate calls will be in accordance with the same restrictions as are required by FCC rules for interstate calls.”

Respectfully submitted,

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¹ See Global Tel*Link Corp., *In re Global Tel-Link Corp.*, Docket No. TF-2019-0039, Response to Office of Consumer Advocate Comments, Oct. 20, 2020, at 2-3.