

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

**IN RE:**

**RELIANCE TELEPHONE OF GRAND  
FORKS, INC.**

**DOCKET NO. TF-2019-0026**

**COMMENTS OF PRISON POLICY INITIATIVE, INC.**

The Prison Policy Initiative, Inc. (“PPI”) joins in the comments filed in the above-captioned proceeding on January 19, 2021 by the Office of the Consumer Advocate (“OCA”). Specifically, PPI strongly agrees with the OCA’s comments regarding the inappropriate payment-fee provisions in Reliance Telephone’s proposed revised tariff. Federal rules concerning ancillary fees were implemented to address well-documented abuses in the inmate calling services industry. Reliance’s proposal to charge a \$3 automated payment fee *plus* pass-through card-processing costs to customers constitutes double-dipping that violates the letter and spirit of 47 C.F.R. § 64.6020.

For the reasons stated in OCA’s comments, PPI encourages the Board to require additional revisions to the ancillary-fee provisions of Reliance’s proposed tariff before granting approval.

Dated: January 21, 2021

Respectfully submitted,

**PRISON POLICY INITIATIVE, INC.**

/s/ Peter Wagner

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