STATE OF IOWA DEPARTMENT OF COMMERCE BEFORE THE IOWA UTILITIES BOARD

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

COMMENT

The Office of Consumer Advocate, Iowa Department of Justice, appreciates the changes included in the revised proposed tariff filed January 21, 2021, by Prodigy Solutions, Inc. (Prodigy). OCA has one outstanding concern.

In accordance with the Order Requiring Filing of Revisions to Revised Tariff dated December 11, 2020 (Order), Prodigy added the following sentence to section 2.7 of the revised proposed tariff: "The billing of taxes on intrastate calls will be in accordance with the same restrictions as are required by FCC rules for interstate calls." Because section 2.7 refers not only to taxes but more generally to "Mandatory Taxes, Mandatory Fees and Authorized Fees," the added sentence should be expanded to refer not only to taxes but more generally to "Mandatory Taxes, Mandatory Fees and Authorized Fees." OCA believes this sentence should replace, rather than be used in addition to, the preceding sentence in the revised proposed tariff.

Respectfully submitted, Jennifer C. Easler Consumer Advocate

/s/ Craig F. Graziano Craig F. Graziano Attorney

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OFFICE OF CONSUMER ADVOCATE

¹ Each of these terms is defined and used at 47 C.F.R. §§ 64.6000(b), 64.6000(n), and 64.6070,