

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 December 11, 2020, Global Tel*Link ("GTL") filed a revised tariff in the above-captioned proceeding on January 26, 2021. The Prison Policy Initiative ("PPI"), having previously been granted leave to intervene in this proceeding, submits the following comments in opposition to the revised tariff.

As explained in detail PPI's comments of [October 5, 2020](#) and [October 29, 2020](#), GTL's practice of charging a \$3 automated payment fee and passing through payment-card processing costs violates the letter and spirit of applicable federal law. To the extent that federal rules are ambiguous, the Board should end GTL's practice of double-dipping, by preventing any single customer payment from being subject to both the payment fee described in § 3.8.1 of GTL's proposed revised tariff, as well as the pass-through fees described in § 3.8.4. PPI encourages the Board to withhold approval of the revised tariff until the double-dipping structure is removed.

Dated: February 9, 2021.

Respectfully submitted,

PRISON POLICY INITIATIVE, INC.

/s/ Peter Wagner

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